PDS2004-3300-04-004 (MUP); PDS2004-3310-04-001 (RP); PDS2010-3813-10-002 (SPA); Log No. 04-190-04

for the



July 2019



Visual/Community Character Analysis

Otay Hills Construction Aggregate and Inert Debris Engineered Fill Operation Project

PDS2004-3300-04-004 (MUP); PDS2004-3310-04-001 (RP); PDS2010-3813-10-002 (SPA); Log No. 04-190-04

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TABLE OF CONTENTS

Section	<u>n</u>		<u>Page</u>
EXEC	UTIVE	E SUMMARY	ES-1
1.0	INTR	ODUCTION	1
	1.1 1.2 1.3 1.4	Study Purpose	1 1
2.0	PROJ	ECT DESCRIPTION	2
	2.1 2.2 2.3	Project Components Land Use Designations and Zoning Regulatory Framework 2.3.1 County of San Diego General Plan – Conservation and Open Space Element 2.3.2 East Otay Mesa Specific Plan 2.3.3 Resource Conservation Area 2.3.4 Dark Sky Ordinance	6 7 9
3.0	VISUAL ENVIRONMENT OF THE PROJECT		
	3.1 3.2 3.3	Project Setting	10 11 12
4.0	EXIST	ΓING VISUAL RESOURCES AND VIEWER RESPONSE	17
	4.1	Existing Visual Character 4.1.1 Visual Character 4.1.2 Visual Quality Viewer Response 4.2.1 Viewer Groups and Sensitivity, Exposure and Awareness	17 19 20
5.0	VISU	AL IMPACT ASSESSMENT	
	5.1 5.2 5.3	Guidelines for Determining Significance Key View Assessment of Visual Character and Quality 5.3.1 Assessment of Visual Character 5.3.2 Assessment of Visual Quality Assessment of Viewer Response	25 26 28

TABLE OF CONTENTS (cont.)

Section	<u>n</u>	<u>P</u>	Page
	5.5	Determination of Significance 5.5.1 Guideline 1: Detract from or contrast with existing visual character and/or quality by conflicting with important visual elements or the quality of the area, or by being inconsistent with applicable design guidelines	
		5.5.2 Guideline 2: Result in the removal or substantial adverse change to valued visual elements	
		5.5.3 Guideline 3: Substantial obstruction, interruption, or detraction from a valued focal and/or panoramic vista	
		5.5.4 Guideline 4: Compliance with applicable goals, policies or requirements	50
	5.6 5.7	Cumulative Visual Impacts Summary of Project Impacts and Significance and Conclusions	
6.0	VISUA	AL MITIGATION AND DESIGN CONSIDERATIONS	79
7.0	REFE	RENCES	80
8.0	REPO	ORT PREPARERS	81
		LIST OF TABLES	
No.	Title	<u>P</u>	age
1	Cumul	llative Projects	58

TABLE OF CONTENTS (cont.)

LIST OF FIGURES

<u>No.</u>	<u>Title</u>	Follows Page
1	Regional Location	2
2	Project Location – USGS Quadrangle Map	
3	Aerial Photograph and Topographic Elevations in the Project Vicinity	
4	Extraction Impact Footprint	
5	Proposed Facilities Layout	2
6	Cross-section, Phase 1	4
7	Cross-section, Phase 2 (2a, 2b & 2c) Extraction	4
8	Cross-section, Phase 3 (3a, 3b, 3c & 3d) Extraction	6
9a	Cross-section, Phase 4 (4a & 4b) Reclamation	6
9b	Cross-section, Phase 4 (4c & 4d) Reclamation	6
9c	Cross-section, Phase 4 (4e) Reclamation	6
9d	Proposed Post-reclamation Plan	6
10	Site Topography/Slope Analysis	8
11	Photograph Locations/Viewshed Map	10
12	Representative Views A	12
13	Representative Views B	14
14	Typical Views A	16
15	Typical Views B	16
16	Typical Views C	16
17	Typical Views D	16
18	Representative Views A with Project Footprint	36
19	Representative Views B with Project Footprint	38
20	Typical Views A with Project Footprint	40
21	Typical Views B with Project Footprint	40
22	Typical Views C with Project Footprint	40
23	Typical Views D with Project Footprint	42
24	Visual Simulation of View Eastward from Otay Mesa Road Terminus at A	lta Road44
25	Cumulative Projects	54

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EXECUTIVE SUMMARY

The Otay Hills Construction Aggregate and Inert Debris Engineered Fill Operation (IDEFO) Project (Proposed Project) site is located in the unincorporated community of East Otay Mesa in south San Diego County, approximately 0.5 mile north of the U.S.-Mexico international border. The Proposed Project is an application for a Specific Plan Amendment (SPA), a Major Use Permit (MUP), and Reclamation Plan for the extraction and processing of construction aggregate and inert debris landfill on a 438-acre site. The MUP project area consists of 110 acres upon which the mining of construction aggregates, materials processing, and inert debris landfill operations would occur. The balance of the 438-acre Project area would be placed in biological preserve prior to aggregate recovery operations. The Project site is located 8.5 miles east of the Interstate 805 (I-805)/State Route 905 (SR 905) interchange, approximately 2 miles east of the State Route 125 (SR 125)/SR 905 interchange, and approximately 0.5 mile east of the intersection of Old Otay Mesa Road and Alta Road. Existing on-site features include several peaks and canyons, including one large canyon, and native vegetation. A 120-foot San Diego Gas and Electric (SDG&E) power line easement transects the western parcels of the Project site. Several large power line towers and some smaller power poles are located within this easement.

The Proposed Project would include the extraction of aggregate materials (i.e., quarried rock) from the Project site and the processing of those materials for use in construction projects throughout San Diego County. The extraction operations would take place over four phases; depending on the rate of production, the Proposed Project would have a lifespan of approximately 120 years. Project operations would require a variety of equipment ranging in size from trucks to large silos. Mineral resource recovery operations would be conducted through the use of drilling and blasting to fracture rocks. The materials would be extracted from the Project site hills and canyons and would be transported to the six proposed on-site processing plants via trucks or conveyor belts. The processing plants would be metal, geometric structures (rectangular or cylindrical) supported by networks of metal scaffolding and, while generally up to 35 or 45 feet, the asphalt and concrete plants could reach 75 feet in height. Conveyor belts feeding into and out of the plants would be long, spider-like structures with arm-like features extending between the various elements of the operational equipment. The various plant structures mainly would be white, light gray or tan. Once processed, the material would be stored in geometrically conical stockpiles up to 35 feet in height. The exposed soil and material stockpiles also would vary in color from the vegetated and weathered surface soil.

As part of the reclamation process, the site would be utilized as an IDEFO during Phases 3 and 4 of the Project. Inert debris would include excavated soil material from development projects, clean demolition materials, and possibly concrete, asphalt and rock.

Following completion of aggregate extraction operations, the Project site would be reclaimed to a land use consistent with the underlying land use regulations. Reclamation, which includes final grading, application of topsoil, revegetation and broken rock staining as necessary, would commence upon completion of each phase of the Project. The ultimate topography of the site after reclamation would include a nearly level pad approximately 85 acres in size, and approximately 16 acres of slopes up to approximately 190 feet high, with a 1:1 steepness ratio (i.e., 1 foot vertical rise to 1 foot horizontal run).



A concrete and asphalt recycling plant also would be included as part of the Proposed Project. This process involves the import of used concrete and asphalt materials, crushing, and then exporting the material for use as road base or foundation material. These materials also may be blended with rock originating from the site to improve performance characteristics. Incoming and outgoing materials would be stored in stockpiles. This plant, located in the southwest corner of the northern 16-acre parcel, could move around within that parcel as needed.

County-approved visual analysts and a licensed landscape architect evaluated potential modifications to the existing conditions as a result of Project implementation. Project analysis is based on the following elements:

- A map of the viewshed and a discussion of areas from which the site may be viewed as a prominent feature.
- Key Views, a photosimulation, and a discussion of potential changes to key viewpoints.
- A discussion of the visibility of the Project from nearby public and private viewpoints.
- A discussion of the Proposed Project's compatibility with County policies, zoning, and local design guidelines.

The Project site encompasses undeveloped land within the western foothills of the San Ysidro Mountains. The Project site includes slopes and supports disturbed and undisturbed native vegetation, including Diegan coastal sage scrub, cismontane alkali marsh, chaparral scrub, chamise chaparral, southern mixed chaparral, and grasslands. Undeveloped, graded or vacant land immediately surrounds the Proposed Project to the north, east, and south. The closest existing development to the Project site consists of a power plant (Calpine) and Vulcan Materials plant located immediately west of the impact footprint. A prison is in proximity to the Project to the northwest, and a new peaker power plant (Pio Pico) was built in Fall 2016, located immediately west of the existing power plant.

The eastern edges of the developed areas of Otay Mesa comprise the existing visual environment within approximately two miles west of the Project site. Existing development within these adjacent areas includes industrial buildings, two prison facilities, four residences, an auto auction yard, and a commercial establishment. The San Ysidro Mountains are located immediately east of the Project site; and Otay Mountain is located approximately 3.5 miles from the site. This mountain range would not be impacted by the Proposed Project and would continue to provide a backdrop to views toward the east from the surrounding area.

No officially designated State scenic highways or County priority scenic routes are located within the Otay Mesa area. The Proposed Project, therefore, would not impact any current scenic routes.

During operation of the Proposed Project, earthmoving and aggregate processing equipment and the soil and rock exposed on the slopes and pads of the impact footprint would change the patterns of the visual environment on and near the Project site and would contrast with the existing visual environment, currently comprised of undulating hills and native vegetation that provide a visual transition between the mesa and the mountains. During operation, the contrast created by the



Proposed Project would be noticeable but not visually dominant, would not be larger in scale than the surrounding elements, would introduce new diversity, and would moderately interrupt the continuity of overall views. The steeper, rockier slopes created by the Project would support less dense vegetation than the hills surrounding the Project site; final slopes would be steeper (up to 1:1) than the existing hills on and near the Project site and would have horizontal benches spaced evenly across them. The native plants proposed by the Reclamation Plan (EnviroMINE 2014), however, would provide visual continuity between the Project site post-reclamation and the surrounding area, softening the strong contrast and ensuring that the diversity created by the Project would not be incompatible with the existing visual environment. Additionally, the Project would be compatible with the current undeveloped/industrial character of the area, and reclamation of the site would allow future development that would be compatible with future surrounding development according to the East Otay Mesa Specific Plan (EOMSP). The Project, therefore, would not cause a significant impact to the existing visual environment (Guideline 1).

The Proposed Project elements would not interrupt views of the largest, silhouetted mountains; the San Ysidro Mountains would continue to provide the dominant background in eastward views of the area. Post-reclamation, the Project site would be characterized by manufactured slopes that would be taller, steeper, and more uniform and geometric than the existing hillsides, with evenly spaced benches extending horizontally across the length of the new slopes. This configuration would affect continuity of the area's visual environment. Undisturbed native vegetation existing on the Project site would be impacted, although not all of the vegetation would be disturbed at the same time, and the strongest contrast between the exposed soil and the surrounding undisturbed vegetation would be temporary. The proposed Reclamation Plan includes a Revegetation Plan with similar species. The site reclamation would soften the contrast created by the exposed soil and would ensure that the Proposed Project slopes would be more compatible with the existing vegetation on the hillsides and pads abutting the Project site. The approximately 329 acres of open space preserved as part of the Project east of the mining footprint would ensure that visible native habitat is retained *in perpetuity*. Proposed project impacts to valued visual elements would be less than significant (Guideline 2).

The Proposed Project would not degrade the quality of views from public trails such as Otay Mountain Truck Trail and the trail leading north from Calzada de la Fuente; visible elements of the Project would be below visible slope lines when viewed from the west, and below the viewer when viewed from the east. No other public parks or recreation areas, surface waters or major drainages, ridgelines, or other sensitive public viewpoints are located within the Project site or close enough to the Project site to provide sensitive viewpoints. The Project, therefore, was found to have no significant adverse visual impacts due to degradation of these resources (Guideline 3).

The San Ysidro Mountain foothills and canyons, identified in the EOMSP as areas of special scenic beauty, would either not be impacted (Johnson and O'Neal Canyons) or not substantially impacted (foothills) by the Proposed Project. Additionally, although potential scenic highways exist in the area, none are currently designated; therefore, the Project would not impact scenic highways. The lighting proposed for the Project would meet the objectives of the County Dark Sky Ordinance/Light Pollution Code (LPC) and would be visually similar to lighting at the closest developed facilities, including the power plant and the prisons. Lights would be shielded and focused as necessary so that light spill onto adjacent properties would not occur. The Project, therefore, would meet the applicable policies and planning guidelines for the area (Guideline 4).



While the Proposed Project in combination with the anticipated development of nearby industrial and roadway projects in the area would create a substantial change to the visual environment of East Otay Mesa, the cumulative level of visual change is consistent with County plans and would not significantly impact scenic resources. The project's contribution to this less than significant change would be less than considerable.



1.0 INTRODUCTION

1.1 Study Purpose

The following Visual Impact Analysis was prepared for the Otay Hills Construction Aggregate and Inert Debris Engineered Fill Operation (IDEFO) Project (hereinafter referred to as "Proposed Project" or "Project"). The purpose of this study is to assess the visual impacts of the Proposed Project, determine the significance of the impacts under the California Environmental Quality Act (CEQA), and propose measures to avoid, minimize, or mitigate adverse visual impacts associated with Proposed Project construction on the surrounding visual environment.

This analysis has been prepared per the County of San Diego (County) Visual Analysis guidelines using the CEQA Guidelines of Significance and is based on the Project Description found in Chapter 2.0 of the Project Environmental Impact Report/Environmental Impact Statement (EIR).

1.2 Key Issues

This report evaluates potential impacts to the visual character and quality of the Project site and surrounding area as viewed from points within the Project viewshed, as well as consistency with applicable ordinances and design guidelines.

1.3 Principal Viewpoints to be Covered

This report evaluates principal views of the Proposed Project from public roads, trails, potential scenic highways (or designated priority scenic roadways), and recreation areas. In particular, this report discusses potential impacts to views from nearby roadways such as Otay Mesa Road, Alta Road, and Paseo de la Fuente, and recreational trails such as the Otay Mountain Truck Trail.

1.4 **Project Location**

The Project site is located in the unincorporated community of East Otay Mesa in south San Diego County, approximately 0.5 mile north of the U.S.-Mexico international border, 8.5 miles east of the Interstate 805 (I-805)/State Route 905 (SR 905) interchange, 2 miles east of the SR 125/SR 905 interchange, and 0.5 mile east of the intersection of Old Otay Mesa Road and Alta Road (Figure 1, Regional Location). The Project site is located in Township 18 South, Range 1 East, Sections 28, 29, 30 and 32 on the San Bernardino Meridian U.S. Geological Survey (USGS) 7.5-minute Otay Mesa quadrangle (Figure 2, Project Location – USGS Quadrangle Map). The Project impact footprint is located at the eastern extension of Otay Mesa on the southwestern flank of the San Ysidro Mountains. The Project is within the South County segment of the County of San Diego Subarea Plan for the Multiple Species Conservation Plan (MSCP) and is divided among four County MSCP Subarea Plan designations: Major Amendment Area, Minor Amendment Area, Minor Amendment Area Subject to Special Consideration, and Proposed Hardline Preserve. Figure 3, Aerial Photograph and Topographic Elevations in the Project Vicinity, is an aerial photograph of the Project site and surrounding vicinity.



2.0 PROJECT DESCRIPTION

2.1 **Project Components**

The Proposed Project is an application for a Specific Plan Amendment (SPA), a Major Use Permit (MUP), and Reclamation Plan for the extraction and processing of construction aggregate and inert debris landfill on a 438-acre site. The MUP project area consists of 110 acres upon which the mining of construction aggregates, materials processing, and inert debris landfill operations would occur. The balance of the 438-acre Project area would be placed in biological preserve (Multiple Species Conservation Program Hardline Preserve) prior to aggregate recovery operations. Additional biological preserve areas would be created on a portion of the mined and reclaimed resource recovery areas. Depending on the rate of production, the Proposed Project would have a lifespan of approximately 120 years. Figure 4, *Extraction Impact Footprint*, illustrates the abovegrade grading and ultimate pit depth for the Proposed Project.

Approximately 89.2 million tons of mineral resources would be extracted from the Project footprint area and over 32 million cubic yards of inert debris would be received. Initial vegetation clearing is expected to occur over the entire development footprint within the first 16 years. Anticipated operations at the site would include the following:

- Phased recovery of rock resources
- Materials processing (primary and secondary plants)
- Concrete ready-mix (batch) production
- Cement-treated base (CTB) production
- Asphalt batch production
- Recycling of asphalt and concrete products
- IDEFO

The aggregate extraction operation would occur on an approximately 110-acre area of the impact footprint, while processing activities would take place on an approximately 16.1 acre pad located at the northern portion of the impact footprint (Figure 5, *Proposed Facilities Layout*). Some crushing and screening may occur in the extraction area. Hours of operation for processing activities primarily would be from 5:00 AM to 10:00 PM, with mining operations outside these hours only as needed for public health, safety and welfare concerns (e.g., requested by a public/state agency). Maintenance of equipment and export of material would occur 24 hours per day. Anticipated levels of mineral production are between 0.6 and 1.6 million tons per year.

Mineral resource recovery operations would be conducted through the use of drilling and blasting to fracture rocks. Blasting would occur approximately once per week following drilling of bore holes 3 to 6 inches in diameter and 45 feet deep, in a 10- by 12-foot grid. Some dust would be created by the blast and would dissipate within 30 to 60 seconds. Following blasting, the rock resource would be fractured and moved with conventional earthmoving equipment. The extracted material would be transported within the site to the on-site processing plants via trucks or conveyor belts. Six processing plants are proposed within the Project impact footprint: two materials processing plants (primary and secondary), a concrete ready-mix plant, a CTB plant, a recycling plant, and an asphalt plant (Figure 5). The processing plants would be metal, geometric structures (rectangular or cylindrical) supported by networks of metal scaffolding, and while generally up to



35 or 45 feet high, the asphalt and concrete plants could reach 75 feet in height. Conveyor belts feeding into and out of the plants would be long, spider-like structures with arm-like features extending between the various elements of the operational equipment. Once processed, the material would be conveyed, again by trucks or conveyor belts, to stockpiles or bins. The stockpiles would be geometrically conical piles of materials up to 35 feet in height. The conveyor belts would connect the lower portions of the processing plants to the top of the stockpiles or storage bins. The various plant structures mainly would be white, light gray or tan.

Also shown on Figure 5 are primary lighting elements associated with the facility. Away from the pads, a single perimeter light at the end of Calzada de la Fuente and adjacent to the Calpine power plant would be located at the facility entrance, focused on the entry and away from the street. Onsite night-lighting associated with mining/processing would include approximately 18 fixtures, with a variety of wattage. All fixtures exceeding 250 Watts (locations shown on Figure 5) would be oriented so as to provide light within site boundaries. Fixtures near to Project boundaries with potential to light off-site properties would be focused and shielded toward the site to ensure compliance with the County Light Pollution Code (LPC).

The stored materials would be used to create concrete, asphalt, or similar materials for use in the construction of roads and buildings. These aggregate materials would be mixed on site and fed into trucks to be taken where needed. The plants that mix the aggregate materials would be similar in size and appearance to the processing plants, rectangular or cylindrical metal structures supported with metal scaffolding. Conveyor belts would be used to move the stored gravel, sand, and rock to the appropriate portion of each of these plants. The material then would be distributed in measured quantities into trucks or mixing areas. Buildings associated with the aggregate plant would likely include an office building, a small scale office, and small maintenance shop.

The concrete ready-mix plant would consist of a feed hopper, feed conveyor, batching plant, cement storage silos, and an operations building. A conveyor would feed the required aggregate into the aggregate storage bins. The highest point for this plant would be 75 feet at the top of the concrete ready mix plant.

The hot mix asphalt (HMA) plant would be sited such that materials could be conveyed from the aggregate stockpiles for direct loading of the asphalt plant by conveyor. The height of the HMA plant would be approximately 75 feet. Three silos, which look like grain silos on a farm, would be the tallest structures at the facility. The tall elevation is needed to allow for a surge of material to be stored and for gravity to discharge it to the trucks. The next highest structure would be the baghouse and its ducting, which typically stands 45 feet high.

A CTB plant would be located at the site. CTB is a rock/sand mixture that has been mixed with cement powder to provide improved strength and stability for highway and foundation projects.

A concrete and asphalt recycling plant also would be included as part of the Proposed Project. This process involves the import of used concrete and asphalt materials, crushing, and then exporting the material for use as road base or foundation material. These materials also may be blended with rock originating from the site to improve performance characteristics. Incoming and outgoing materials would be stored in stockpiles.



The primary processing (which includes the use of a jaw crusher) may be extended to the extraction areas using conveyor belts. Some crushing and screening would eventually occur below grade, within the pit area. The HMA plant, aggregate processing plant, and concrete ready mix plant would be stationary and therefore, would not be relocated. Equipment shown on the southern end of the 16.1-acre pad (Figure 5), including the recycling plant and primary crusher, is portable and eventually would be relocated to the quarry floor as excavation progresses below grade.

Pursuant to the requirements contained in the Conceptual Fire Protection Plan (EnviroMINE 2014c; EIR Appendix K), a buffer, or vegetation management zone, of at least 100 feet wide would surround all inhabited structures over 250 square feet in size (Figure 5). The vegetation management zone would begin at the structures or processing equipment and extend out on all sides to the unmodified vegetation. In addition, a vegetation management zone would be located around all retention basins, water district and power line rights-of-way, and roads within the Project's impact footprint. This zone would be located entirely within the impact footprint and west of the SDG&E transmission line right-of-way.

The Proposed Project would consist of site preparation for the processing plant equipment and a phased extraction and backfilling operation. Ongoing backfilling of the site during the open pit extraction phase of the Project would allow reclamation to progress concurrently with the extraction operation. Site operations are proposed to occur in four phases:

- Phase 1 would include site preparation activities prior to mining, including initial grading to establish access routes, extending water and power service to the site, and grading pad areas for the processing plant location on 16.1 acres. Construction of the processing plant, concrete batch plant, asphalt plant, CTB plant, and site office would also be commenced. This phase would last approximately one year and would be located as shown on Figure 6, *Cross-section, Phase 1*.
- Phase 2 would involve commencement of extractive operations within the extraction footprint. This phase is divided into three sub phases, with Phase 2a occurring in the north and ending with Phase 2c in the south. Rock extraction would occur to the natural grade elevation of land that exists along the western perimeter of the site (ranging between 580 and 650 feet above mean sea level [amsl]). During Phase 2a, aggregate resource would be recovered immediately adjacent to the Phase 1 area and over an approximately 19.2-acre area of the site. Extractive operations in Phase 2a are expected to remove 4,8 million tons and would continue for approximately five years. As aggregate resources are depleted from Phase 2a, extraction operation would transition into Phase 2b. Phase 2b operations would include extraction of approximately 5.4 million tons of material from a 27.7-acre area and is expected to continue for approximately six years. Phase 2c would consist of extracting approximately 10.9 million tons of material from the remainder of the extraction footprint (45.8 acres) and is expected to continue for approximately 11 years. The length of each sub phase would be dependent upon the demand for aggregate resources but is currently anticipated to extend approximately 22 years overall. Physical locations of the phasing are shown on Figure 7, Cross Section, Phase 2 (2a, 2b & 2c) Extraction.
- Phase 3 would include open pit extraction of mineral resources within the Phase 2 footprint to a maximum depth of 525 feet from the existing grade in four overlapping phases, and



backfilling beginning as excavation is complete within each area. Like Phase 2, Phase 3 is divided into sub phases, and Phases 3a through 3d also would progress in a north to south direction. The Phase 3a operations would involve additional extraction of material from an 8.5-acre area that would extend a maximum depth approximately 285 feet from the existing grade. This phase is expected to remove 3.3 million tons and would continue for approximately three years. Phase 3b operations would consist of extracting 16.1 million tons of material from a 22.1-acre area, over approximately 16 years. Phase 3c would extract 17.9 million tons of material from a 22.1-acre area, over approximately 18 years. Phase 3d operations are expected to extract 30.7 million tons from a 33.7-acre area, over approximately $31\pm$ years. As with Phase 2, the length of each sub phase would be dependent upon the demand for aggregate resources. Physical locations of the phasing are shown on Figure 8, *Cross Section, Phase 3 (3a, 3b, 3 & 3d) Extraction*.

• Phase 4, the IDEFO phase, would begin as extraction operations advance in Phase 3. Phase 4, also divided into sub phases to correspond with the sub phases of Phase 3, would consist of backfilling the Phase 3 pit areas with inert fill material (fill dirt). Inert debris would include excavated soil material from development projects, clean demolition materials, and possibly concrete, asphalt, and rock. Phase 4 activities would continue for approximately 67 years throughout the extraction operation and are expected to last approximately 16 years beyond the extraction operation (Phase 3) for final revegetation and monitoring. Physical locations of the phasing are shown on Figures 9a through 9c, Cross-section, Phase 4 (4a through 9e) Reclamation, and Figure 9d, Proposed Post-reclamation Plan.

The Project impact footprint would be reclaimed to be consistent with the underlying land use regulations. Reclamation, which includes final grading, application of topsoil, staining of aboveground cut rock as appropriate and revegetation, would commence upon completion of each phase. Although reclamation would occur in each phase as recovery operations are concluded, these activities would be similar on all areas of the site. Final reclamation would occur when all recovery operations have been completed. These activities would include final grading to establish the final land form, removal of plant equipment, application of topsoil resources on the pad, and revegetation. The ultimate topography of the site after reclamation would include a nearly level pad up to 85 acres in size, and approximately 16 acres of slopes up to approximately 190 feet high, with a 1:1 steepness ratio (i.e., 1 foot vertical rise to 1 foot horizontal run).

As indicated above, where soil conditions allow, slopes would be seeded with native and locally appropriate species to include "areas of brush cover with intervening areas of rock outcroppings," according to the Proposed Project Reclamation Plan (EnviroMINE 2014). The proposed palette contains mainly low-growing shrubs, annual flowers and grass-like plants, including: buckwheat, monkey flower, redberry, sage, California poppy, and lupine. Additional larger shrubs such as toyon and laurel sumac are also included, but in lesser quantities that reflect the sparser distribution of such shrubs in the surrounding hills. Pad areas would be seeded with a similar mixture of mostly low-growing shrubs and annuals to stabilize the site against accelerated erosion and sedimentation. Portions of the slopes would be prepared for seeding as a biological buffer adjacent to sensitive biological habitats proposed to be set aside by the project to the east of the proposed extractive operations. Exposed rock outcroppings would be stained to lessen the visual dominance of the modified slopes.



Drought-tolerant trees and shrubs would continue streetscape planting at the northwest corner of the property along from the Project property line fronting Calzada de la Fuente for approximately 425 linear feet. The proposed planting area would be approximately 9,705 square feet. Screening canopy trees may include species such as Brisbane box (*Lophostemon confertus*), Australian willow (*Geijiera parvifolia*) and coast live oak (*Quercus agrifolia*). Landscaping also would include evergreen scrubs such as lemonade berry (*Rhus integrifolia*), toyon (*Heteromeles arbutifolia*) and Yankee Point California lilac (*Ceanothus griseus horizontalis 'Yankee Point'*). The proposed landscaping would be watered using irrigation equipped with rain sensors to automatically shut off the system during periods of high rainfall.

It is assumed that the lots to the south of the power plant would be developed in the near future with heavy industrial uses (by others) that would screen quarry activities from views along Alta Road; therefore, no screening landscaping is proposed in this location.

The site would be managed in this manner until an appropriate land use is identified consistent with the underlying land use designation of Mixed Industrial, as implemented by the Project.

2.2 <u>Land Use Designations and Zoning</u>

The Proposed Project area is subject to the County General Plan Land Use Designation (21) Specific Plan Area and the zoning is S88 (Specific Planning Area). The MUP site is within the East Otay Mesa Specific Plan (EOMSP) area, of the Otay Subregional Plan Area. Based on Section 3.1 of the EOMSP, the proposed aggregate mining and inert debris landfill activities require approval of a MUP and Reclamation Plan. The proposed site is located within two current land use designations (Mixed Industrial and Rural Residential) of the EOMSP. The EOMSP S88 zoning allows for a density of 0.05 (1 DU per 20 acres) in the Rural Residential area, and a lot size of 30,000 square feet in the Mixed Industrial portion of the Project site.

The SPA is proposed to establish a long-term land use policy for the area planned for extractive operations, IDEFO, and subsequent industrial use. The SPA would change the designation of approximately 36.3 acres of Mixed Industrial land to Rural Residential. These lands are found to the north and east of the Proposed Project site. In addition, approximately 85.7 acres of land currently designated Rural Residential would be designated as Mixed Industrial. All of the Rural Residential conversion to Mixed Industrial is located within the proposed quarry footprint. The SPA would therefore result in a net increase of 49.4 acres of industrial land. Following completion of all mining operations, the site would be backfilled and reclaimed to pad areas. It is assumed that post-mining land uses on these pads would be consistent with the underlying land use designation. The Reclamation Plan would therefore include all necessary steps to prepare the Project site for uses permitted by the Mixed Industrial land use designation.

2.3 Regulatory Framework

This discussion provides an overview of federal, state and local regulations and ordinances applicable to the Project.

No specific federal or state highways regulations pertain as the Project is not located along these features and would not place Project-related outdoor advertising along them. California's Scenic Highway Program is intended to preserve and protect scenic highway corridors from change that



would diminish the aesthetic value of lands adjacent to highways. The California Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been so designated. The only highways in the Project vicinity are I-905 and SR-125. Neither is designated as a scenic highway, nor have they been determined to be eligible for designation.

Visual resources also may be subject to plans and policies that ensure adequate consideration is given to preserving and/or enhancing the visual qualities of an area. These policies aid in evaluation of the planning agency/community perception of visual qualities within an area, as well as providing guidance as to whether Proposed Project modifications would be visually compatible with County and/or community goals.

The County's Resource Protection Ordinance (RPO) provides development controls for unique resources within the County deemed to be fragile, irreplaceable and vital to the general welfare of the County's residents. An element of the ordinance focuses on the preservation and protection of the County's unique topography. The County has determined that the RPO does not apply to the Project and it is therefore not addressed in this section. Related discussion relative to steepness of topographic features, however, is provided under the heading "Steep Slopes" below.

The Proposed Project is subject to the following guidelines and policies.

2.3.1 County of San Diego General Plan – Conservation and Open Space Element

The Conservation and Open Space (COS) Element of the County's General Plan provides direction for future growth and development in the County with respect to conservation, management, and utilization of natural resources; protection and preservation of open space; and the provision of park and recreational resources. It provides guidance with respect to the protection of visual resources, including scenic corridors, geographically extensive scenic viewsheds, and dark skies within the natural environment. Four COS Element Policies are applicable to the Proposed Project; addressing scenic resources, ridgelines/hillsides, dark skies, and scenic highways.

2.3.1.1 Preservation of Scenic Resources

- COS-11.1: *Protection of Scenic Resources*. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landmarks.
- COS-11.2: *Scenic Resource Connections*. Promote the connection of regionally significant land features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.
- COS-11.3: *Development Siting and Design*. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:
 - Creative site planning
 - Integration of natural features into the project



- Appropriate scale, materials, and design to complement the surrounding natural landscape
- Minimal disturbance to topography
- Clustering of development so as to preserve a balance of open space vistas, natural features, and community character
- Creation of contiguous open space networks

2.3.1.2 Preservation of Ridgelines and Hillsides

COS-12.1: *Hillside and Ridgeline Development Density*. Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

COS-12.2: Development Location on Ridges. Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.

2.3.1.3 Dark Skies

COS-13.1: *Restrict Light and Glare*. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.

2.3.1.4 Scenic Highways

Based on the County COS Element, the closest County designated scenic highway to the Project is Otay Lakes Road, located approximately 4.0 miles northwest of the Project site as the bird flies. In the 2007 County Scenic Highways List, one third priority scenic roadway is located approximately 2.0 miles west of the Proposed Project, Harvest Road and Otay Freeway (from the U.S.-Mexico international border to Proctor Valley Road). The southern portion of Harvest Road is aligned between industrial developments, while the northern portion is unpaved and parallels the eastern edge of an industrial development. The alignment north of Otay Mesa Road has been removed from the EOMSP Subarea 1 Circulation Element. Per the 2012 General Plan COS Element, at this time, Harvest Road is not designated as scenic.

2.3.1.5 Steep Slopes

As noted above, the County generally protects natural slopes with a natural (i.e., not previously modified) gradient of 25 percent or greater and a minimum rise of 50 feet. The Project is exempt from the RPO, but information regarding on-site slopes meeting the specified standards of slope and rise is provided here for context as the steepest slopes contribute to viewshed elements. Relative to the slopes shown on Figure 10, *Site Topography/Slope Analysis*, most of these slopes are located within portions of the Project identified for preservation in open space; but some of these slopes are located in the southern portion of the Project that would be subject to mining. The steepest slopes within the Project impact footprint mostly are contiguous with the abutting foothills, and as such mostly are located near the Project boundaries in the eastern portions of the Project site. Approximately 22 acres, or 20 percent, of the Project mining area consists of slopes



exceeding 25 percent slope and having a rise of 50 feet or greater. Less than an acre of these slopes is greater than 50 percent (1:2), and the acre is comprised of small and scattered areas among the slopes near the eastern Project impact footprint boundary. The topography of the site overall is gentle; there are no abrupt changes of grade (such as a cliff or incised creek). Therefore, the slope areas of greater than 25 percent (1:4) are not highly distinguishable, particularly from public viewpoints such as the points from which the photographs were taken west of the Project impact footprint. Refer to Figure 10, for a map of the slopes on site; areas shown in white or yellow are less than 25 percent gradient, while areas in orange or red are steeper than 25 percent gradient. Figure 3 provides additional context for elevations and heights of slopes visible in the vicinity of the Project.

2.3.2 East Otay Mesa Specific Plan

The EOMSP, which overlays the project site, includes site planning, landscaping and architectural standards, designed to create industrial and business parks with strong identities, distinction, and quality. The following EOMSP Urban Design Policies are applicable to the Proposed Project:

- Policy UD-1: Encourage the preservation and enhancement of visually prominent land forms and areas of special scenic beauty, particularly the San Ysidro Mountain foothills and the valley walls of Johnson and O'Neal Canyons (County 2015: 54).
- Policy UD-6: On-site landscaping along public streets should be compatible and complementary with the streetscape design of the public right-of-way (County 2015: 55).

2.3.3 Resource Conservation Area

The Otay Subregional Plan identifies Otay Mountain as a resource conservation area (RCA) that is significant for scenic landmark, and for biological habitat. Figure 11, *Photograph Locations/Viewshed Map*, shows the RCA boundary relative to the Project. As shown, the western extent of the RCA crosses area identified as Project Biological Open Space. The active mining area shown on the figure is a minimum of 850 feet away and down slope at the closest point (at the very northeast portion of the Project footprint). The designation in the Otay Subregional Plan states:

Otay Mountain—Lower Otay Lake: This area is of statewide significance. It includes Lower Otay Reservoir, rare and endangered plants on the lower mesa areas, and Otay Mountain. Otay Mountain contains the world's largest population of the rare Tecate cypress (*Cupressus forbessii*) and numerous other rare and endangered plants, such as Gander's pitcher sage [*Lepechinia gander*], Otay manzanita [*Arctostaphylos otayensis*]. Orcutt's brodiaea (*Brodiaea orcuttii*), Dunn's mariposa lily (*Calochortus dunnii*), and dense reed grass (*Calamagrostis densa*). The Mexican fremontia (*Fremontodenron mexicanum*) may occur on the slopes of Otay Mountain in areas adjacent to the Otay Ranch/San Ysidro Planning Area #17 where the only known U.S. population of this species is located. Otay Mountain is predominantly under the Bureau of Land Management ownership. California Natural Area Coordinating Council lists it as a Significant Natural Area. Vernal pools and their attendant rare species occur on the mesas around the Lower Otay Reservoir. Otay Mountain is also a major scenic landmark for the region.



2.3.4 Dark Sky Ordinance

In addition to the policies regarding dark skies contained in the COS Element of the General Plan, the County of San Diego County of San Diego Outdoor Lighting Ordinance (Division 9, sections 59.101-59.115 of the San Diego County Zoning Ordinance) seeks to control undesirable light rays emitted into the night sky in order to reduce detrimental effects on astronomical research. Zone A, defined as the area within a 15-mile radius centered on the Palomar Observatory and within a 15-mile radius centered on the Mount Laguna Observatory, has specific light emission restrictions. The unincorporated portions of San Diego County not within Zone A fall within Zone B, are subject to lesser restrictions. Outdoor lighting, such as security or parking lot lighting must be fully shielded within Zone B.

The Project site is located more than 15 miles from the Palomar and Mount Laguna Observatories, and is, therefore, within Outdoor Lighting Ordinance Zone B.

3.0 VISUAL ENVIRONMENT OF THE PROJECT

This section addresses the existing setting and visual conditions in the area and includes photographs of the site. This section also includes a discussion of the Project viewshed, as well as the numbers of viewers in the area, and the location, type and frequency of views. The existing visual and landform setting is based on an analysis of photographs, topographic mapping, aerial photographs, reference document reviews, and documented on- and off-site land uses, as well as site reconnaissance.

3.1 **Project Setting**

3.1.1 Topography

The Project site is located within the western foothills of the San Ysidro Mountains. The topography east of the Project site is varied and includes many steep slopes, canyons and peaks. The peaks within the San Ysidro Mountain range vary in height from 1,020 feet above mean sea level (AMSL; within the Project site, as described above), to 3,566 feet AMSL at Otay Mountain, approximately 3.5 miles northeast of the Project site. Several canyons are located between these peaks; most of the canyons in the vicinity of the Project site drain into the Otay River Valley, to the north and west of the Project site, while some drain southward into the Tijuana River.

The topography surrounding the Project site to the west is relatively flat, with some gentle variations between 600 feet AMSL at the western edge of the Project impact footprint, and 500 feet AMSL approximately 3.0 miles west of the Project at Brown Field Airport. The most significant topographic variation in the vicinity occurs within and because of the canyon drainages (Johnson and O'Neal canyons) northwest of the Project site. These drainages have incised the plateaus upon which some development is located. The topography in the vicinity of these canyons drops from 700 feet AMSL (at the County East Mesa Detention Facility) and 600 feet AMSL (at the Donovan Correctional Facility) to approximately 300 feet AMSL within the Otay River Valley. The valley walls of Johnson and O'Neal Canyons and the San Ysidro Mountain foothills are visually prominent land forms and areas of scenic beauty discussed in the EOMSP (County 2015). The



Urban Design Policies of the EOMSP include the preservation of these land forms, which are visible from circulation element roads, including Alta Road and (Old) Otay Mesa Road.

The topography of the Project site and the surrounding area is illustrated in Figures 10 (depicting Project contours) and 3, providing elevational context, respectively. Figure 11 depicts the Project site on an aerial with surrounding mountainous areas clearly visible.

Several peaks and canyons, including one large canyon, exist within the Project site boundaries. One large canyon flows via an unnamed drainage westward through the Project site, bisecting the northern half of the Project impact footprint and turning southward just beyond the Project boundary. This canyon has a minimum elevation of approximately 650 feet AMSL within the Project site. A second canyon, located in the southeastern portion of the Project impact footprint, contains the lowest elevation of the 110-acre impact footprint, approximately 620 feet AMSL. The slopes of this canyon rise to the highest point within the Project impact footprint, at 820 feet AMSL. A neighboring peak to the east is the highest point within the Project site, rising to approximately 1,020 feet AMSL. These peaks are part of the San Ysidro Mountains bordering the Project impact footprint to the north and east.

3.1.2 Existing Land Uses

Figure 3 illustrates the land uses within the Project site and the surrounding area. The immediate setting of the Project site mainly consists of undeveloped land and industrial uses. The closest development to the Project site consists of the Calpine plant and Vulcan Materials plants located immediately west of the impact footprint. The land adjacent to the remainder of the impact footprint is either graded and vacant or undeveloped. The area between the power plant and batch plant has been graded and is currently vacant. The remaining undeveloped lands are covered with low-growing grasses, while some scattered trees, near the topographic low spots and bordering the power plant property, provide dark green accents within the views of this area.

Areas immediately south of the Project consist of undeveloped land and farther to the south are industrial portions of Tijuana, Mexico. Starting approximately 0.5 mile west and southwest of the Project site and spreading westward, are industrial developments consisting of large boxy buildings and automobile and/or equipment yards. Two prison facilities, the R.J. Donovan Correctional Facility and the County East Mesa Detention Facility, are located approximately 1.5 miles north of the Project impact footprint. Two airports, Brown Field and Tijuana International Airport are in the vicinity; Brown Field is a general aviation airport in the City of San Diego approximately 3 miles west of the Project impact footprint, and Tijuana International Airport is in Tijuana, Mexico, approximately 2.5 miles to the southwest. The buildings making up the various industrial and (excluding towers) prison developments in the area are boxy, white, and up to three-story buildings with few windows, and are surrounded by surface parking lots. A few trees are planted within and around the parking lots; however, the buildings, automobiles and other vehicles are visually prominent within these areas. Undeveloped lots scattered between the various facilities generally support low-growing grassy plants that are brown most of the year, and green in the spring.

The international border between the U.S. and Mexico is located approximately 0.5 mile south of the Project impact footprint. The border is visible from slightly more elevated points in the Project



area (refer to View 2 on Figure 12, *Representative Views A*, discussed below) as a line beyond which industrial and residential portions of Tijuana are visible.

The San Ysidro Mountains lie north and east of the Project impact footprint. The mountains and foothills are largely undeveloped. A few roads, such as the Otay Mountain Truck Trail and some dirt trails cross these mountains, which are largely overlaid by a San Diego County RCA for Biologically Sensitive lands. The Otay Mountain Cooperative Land and Wildlife Management Area and the Bureau of Land Management (BLM) Otay Mountain Wilderness Area, National Wilderness Preservation System land also overlay areas east of the Project impact footprint. The Otay Mountain Truck Trail provides access to the BLM Otay Mountain Wilderness Area, portions of which are located within one mile from the Project impact footprint to the east. Portions of these mountains and their foothills are visible in each of the figures provided in this section.

Area maps were reviewed to identify public recreation areas located within the immediate vicinity of the Project. Besides the trails already mentioned, the closest mapped facilities include the Lower Otay County Park and the Otay County Open Space Preserve within approximately 2.5 miles to the north of the Project impact footprint. These two San Diego County facilities are located within the Otay River Valley.

Five private residential uses are located within 2 miles of the Project impact footprint. These properties include facilities for animals such as horses and sheep, multiple usable and derelict vehicles, as well as some trees and scattered outbuildings. Three private residential farms/ranches are located on Old Otay Mesa Road, approximately 1.3 miles west of the Project impact footprint. The fourth residence is located between the two existing prison facilities, accessed via a dirt road (Kuebler Ranch Road) off of Alta Road before Alta Road reaches the County East Mesa Detention facility (the former Kuebler residential ranch currently supports a commercial R & F Metal, Inc.). The fifth house is located between the two prison facilities, accessed via a dirt road off of Alta Road before Alta Road reaches the County East Mesa Detention facility. Relatively small in scale and separated by large areas of open space, these uses do not form dominant elements within the landscape. The structural uses contribute some level of variation in pattern elements (line and color) through such common features as rows of trees edging a roadway or a small copse of trees associated with the dwelling that can be notable in this otherwise very horizontal and xeric landscape.

The Project site is currently undeveloped, with the exception of a few dirt roads that transect it. Due to the Project's location near the international border, the site is frequently patrolled by the U.S. Border Patrol. A 120-foot SDG&E easement with power lines extends diagonally through the Project site. In addition to the power line right-of-way, four SDG&E utility towers are clustered at the northern extent of the Project property. A 20-foot wide natural gas pipeline easement that was formerly within or parallel to the noted SDG&E easement has been relocated, and now extends generally parallel to and within the western and southern boundaries.

3.1.3 Vegetation

The Project site contains Diegan coastal sage scrub (including disturbed) and non-native grassland. Other types of on-site native vegetation, present in smaller areas within the Project site, include native grassland, cismontane alkali marsh, chaparral scrub, chamise chaparral, and southern mixed



chaparral. Areas of disturbed habitat and developed land (mainly dirt roads) also occur within the site. The Diegan coastal sage scrub existing within the flatter portion of the Project site is visually similar to and not easily distinguishable from the vegetation on the surrounding hillsides. This plant community is composed of generally low-growing shrubs and grasses that are tan, brown, rust red, and light green most of the year. Orange, yellow, and pink flowers are visible in the spring; although the flowers individually are small, when flowering en masse the flower colors create visible patches that shade a hillside. Some larger and darker colored shrubs such as toyon and laurel sumac also grow within the coastal sage scrub area; these shrubs, sparsely scattered among the vegetation on site and in the surrounding hillsides, create darker patches on the northern facing slopes. The non-native grassland contains mainly low-growing grasses that are brown most of the year and produce yellow and white flowers and green foliage in the spring.

3.2 Representative and Typical Views

Figure 11 identifies the location of each photograph taken to illustrate the general Project setting, and views of the Project site and surrounding area. It also places the location relative to County RCA and proposed Project open space. Two types of views provide context for the existing conditions discussion. The figures start with two views from generally undeveloped areas to the east. Considered "representative" views, they illustrate types of views that may be obtained from areas east of the Project. Views from the east are generally restricted based on existing topographic variation (see the areas highlighted in green versus those that are not on Figure 11). They are not considered "typical" because they are viewed only by individuals accessing this backcountry area (largely prohibited from access from points west) and therefore have relatively small viewership. Similarly, the view from the old Kuebler Ranch property (taken from the driveway, the closest location to the Project with the most open view toward it) depicts a potential view that illustrates general principles of visibility but is not considered "typical" due to low viewership. Finally, an unlikely but potential future view is addressed through a view east and south of a street terminus and "looking behind" an existing facility to an area that is not open to the public. Again, it is not considered "typical" as it is not accessible and the number of individuals who could see the view is considered very low. The remainder of the views are generally located westerly of the site, along public paved roads, and are identified as "typical" given their ease of access and relatively large number of viewers along these roads. These latter views include the areas with the most open views toward the Project based on topography.

Together, these views illustrate the existing visual character of the eastern mesa. These photographs illustrate the dominance, scale, diversity and continuity, as well as the varying amounts of vividness and unity of the area surrounding the Project, and establish the baseline visual environment against which the Proposed Project can be evaluated.

The photograph for View 1, Figure 12 was taken from the dirt access road abutting the future Project mining area. It represents a future closest view to the Project mining area from the east. The general area currently contains a number of dirt roads and paths. This area is expected to be less accessible if the Project is approved as a substantial amount of acreage east of the Project (approximately 329 acres) would be in open-space set aside. This panorama represents a view currently available to SDG&E employees, Border Patrol staff, and a limited number of off-road vehicle users (as access to this area is generally posted for no trespass and/or gated off from points west). As such, it is not considered "typical" but is illustrative of the type of expansive views from



the San Ysidro foothills and mountains. These views become even broader and more expansive (although less distinct) as the viewer is sited further to the east.

The view shows existing on-site land uses and the land uses north and west of the site. To the north, the abutting power plant at the northern extent of the Project is prominent in this view; the Donovan prison facility is visible to the right (northwest) of the power plant. Local roads are also visible, as is the nearby auto auction yard and other more distant development in Otay Mesa. The SDG&E power lines that edge developable portions of the Project are visible, as is the U.S.-Mexico international border at the left (southern) edge of the view, beyond which the industrial and residential areas of Tijuana are visible.

View 2 (Figure 12) was taken from the Otay Mountain Truck Trail. When this photograph was taken in 2005, access into the hills could be gained from Alta Road. In 2017, access from the west from south of Otay Mesa Road to approximately the George F. Bailey Detention Center is either gated, posted for "No Trespass," or both, and low levels of traffic may be even lower (access is available from the north from Jamul Valley from the Pio Pico RV Resort approximately 3 miles east of Otay Lakes [as the bird flies] and from Dulzura approximately 9 miles to the east [again, as the bird flies]). As a result, the photograph has not been updated. It has been retained for context, however, as it is still indicative of views that could pertain to a small number of users approaching the mesa from the east and continuing this far to the west.

As shown on Figure 11, most of the mountainous area to the north and east of the viewpoint does not have visibility toward the site. View 2 represents the most encompassing view from the road to the site. The photograph illustrates a portion of the Project proposed for permanent biological preserve (the hillside to the left of the picture and the draw down toward the mesa, or basically the bottom third and left-hand two-thirds of the photograph), just north of the Project's easternmost extent into the hills. View 2 shows the dense development of Tijuana, Mexico, and the grading associated with primarily industrial and commercial development west of the Project impact footprint. The views include the hills within/adjacent to the Project impact footprint as a dominant element in the foreground view. Long-reaching views over the flat mesa areas to the west are illustrated. The location of the neighboring power plant is visible (refer to View 1 in Figure 12 for power plant scale), as are other industrial developments in the surrounding area. The automobiles in the nearby auction yard are reflective and draw the viewer's attention. Straight lines created by area roadways also are visible in the background.

View 3 (Figure 13, Representative Views B) illustrates existing uses in the Project vicinity. This view is from the former Kuebler ranch, currently containing a commercial/industrial establishment and Alta Café restaurant. The view is from the access road to the restaurant, just south of the parking lot. This view shows the Otay Mesa Detention Center just south of a graded pad, the Calpine power plant beyond that on the left side of the photograph, and the Pio Pico Energy Center on the right side of the photograph. Mesa area south of these areas shows as generally developed in this photograph and from this vantage point. Project property is located east of the Calpine facility.

View 4 (Figure 13) is taken from the eastern terminus of Calzada de la Fuente and the northeast edge of the Calpine power plant fence line, looking south-southwest onto Project property. The Calpine fence is visible, as are three transmission tower bases near the viewer. The SDG&E access



road is visible in the center of the photograph. Access to the Project property or open space beyond is not available from this viewpoint; it is both gated and posted for no access.

View 5 (Figure 14 *Typical Views A*) looks directly east at the Pio Pico Energy Center at the southwest corner of Calzada de la Fuente and Alta Road. The photograph looks east along Calzada de la Fuente. This street ends by dead ending into Project property. Existing uses accessed from this road include the Pio Pico Energy Center and the Calpine Energy Center (Calpine power plant) both on the south side of the road, and the CCA Otay Mesa Detention Facility on the north side of the road.

View 6 (Figure 14) was taken directly across Alta Road from the Pio Pico facility. Looking southwesterly over the fully fenced parcel, it has been graded, has a graveled surface, substantial drainage improvements along its northern boundary, lighting and a Quonset hut installed on site. Lacking structures as a whole, the impression is industrial in nature. Looking away from the site, this view does not include Project property, but illustrates a typical type of lot on the mesa.

View 7, Figure 15, *Typical Views B*, illustrates a view of the Project site from Paseo de la Fuente and De la Fuente Court, approximately 0.15 mile east of Alta Road and 0.25 mile north of Otay Mesa Road. It represents a typical view of the site from areas to the west, and from the road accessing adjacent industrial areas to the north and east. The Calpine power plant, Vulcan Materials Plant, and associated roadways and landscaping are the dominant features within this view. Paseo de La Fuente and De la Fuente Court are lined with sidewalks, low-lying, flowering shrubs and street trees (e.g., Mexican fan palms), which provide visual contrast to the earth-toned facilities and the San Ysidro Mountains in the background.

View 8, Figure 15, depicts a view looking east from the intersection of Paseo de la Fuente and Access Road, which provides access to the Vulcan Materials Plant and graded pad on the north side of the road, approximately 0.4 mile east of Alta Road and 0.15 mile north of Otay Mesa Road. The mix of industrial/modified uses and open space on this part of the mesa is clear. The Vulcan Materials Plant is more clearly visible along the right side of this view than in Typical View 7, and the eastern half of the power plant is visible along the left side of the view. Again, the Access Road, sidewalks and landscaping are dominant in the foreground, while the foothills and San Ysidro Mountains draw the eye easterly and up. The highest mountains from this viewpoint are skylined in the distance and the undeveloped nature of those high features is notable in contrast with the hardscape and somewhat industrial elements visible in this view. The tall transmission towers and their right-of-way that bisects the closest hill approximately mid-point are also visible.

View 9, Figure 16, *Typical Views C*, is a view into the Vulcan Materials Company plant located just west of the Project. Taken looking southeasterly from Access Road, this photograph shows the geometric towers, concrete processing equipment, and some storage structures of the facility, which range in color from light yellow to muted gray; as well as the low surrounding walls and streetscape. The lowest foothills of the San Ysidro Mountains within the Proposed Project site are visible east of the batch plant.

View 10, Figure 16, is from the intersection of Alta Road and the terminus of Otay Mesa Road, approximately 0.5 mile to the west of the Project impact footprint. This represents clear eastward views of the visual environment of the site and the surrounding area. Undeveloped land, transected



by dirt roads and vegetated by grasses and low-lying shrubs, is visible in the foreground of the view. The closest points of the Project site are also the lowest. Located within a canyon, the western Project boundary is not visible from this point. The San Ysidro Mountains provide a background for eastward views. This picture provides the most direct and clear views toward the entirety of the Project site relative to existing views. Traffic volumes along the segment of Otay Mesa Road to Alta are noted as 9,065 ADT. As noted, Otay Mesa Road ends at this point, and Alta Road provides northerly access to the commercial businesses at Kuebler Ranch, the prison facilities, and the power plant. The bulk of the traffic at this intersection, therefore, presumably consists of workers at the power plants; Vulcan materials plant; and prison and detention facilities and other businesses; visitors to the prisons; and patrons of the restaurant at Kuebler Ranch (when open). These motorists are not highly sensitive viewers, as they generally would not be recreational viewers, although their expectations of a scenic eastward view and knowledge of the area may be high due to their familiarity with the area.

View 11, Figure 17, *Typical Views D*, was taken from the eastern terminus of Airway Road, just north of Enrico Fermi Place and east of Enrico Fermi Drive, a little more than 0.8 mile southwest of the Project. This figure depicts the impressive effect that the flat mesa grasslands combined with the abrupt hills can have. Although development is visible, this view primarily emphasizes undeveloped elements in order to provide counterpoint to activities in the immediate vicinity of the Project. Views toward the Project and foothills are similar to View 17; however, the flat foreground areas are more dominant in views from this area. The forms of the surrounding foothills and their elevation behind the Project property are silhouetted in the background.

3.3 **Project Viewshed**

A viewshed is an analytical tool to aid in identification of views that could be affected by a project site. A viewshed is comprised of all the surface areas visible from an observer's viewpoint. The limits of a viewshed are defined as the visual limits of the views located from the Proposed Project. The viewshed also includes the locations of viewers likely to be affected by visual changes brought about by Project features. Due to the generally flat and gently varying topography west of the Project impact footprint, views within approximately two miles of the Project impact footprint were included in the Project viewshed analysis. The viewshed for the Project, determined using these criteria, is shown in Figure 11. The viewshed was delineated through computer-aided and field-verified analysis of the topography on site and in the surrounding area.

As shown on Figure 11, the Project would be visible mainly from points west and south. Otay Mesa Road is aligned such that drivers traveling eastward have a view of the most visible hill in the southern portion of the Project as well as the higher slopes behind. Otay Mesa Road is classified as a Major Road with bike lanes from its eastern junction with Otay Mesa Road/SR 905 to its terminus. An average of approximately 8,784 vehicles travel Otay Mesa Road on the four segments east of SR 125, with most drivers that travel to its eastern terminus at Alta Road turning left onto Alta Road (Darnell & Associates 2017). On opening day in 2019 with Project Phases 1 and 2 both assumed, ADT is projected to be approximately 12,067 vehicles on Otay Mesa Road east of Enrico Fermi Drive (Darnell & Associates 2017). Drivers east of SR 125 would have more open views of the Project site. However, several factors reduce the likelihood that the Project would comprise clear or long-term visual elements for these viewers. These features include: (1) the volume of traffic on Otay Mesa Road that demands the driver's attention; (2) distance from the Project which



visually (a) mutes individual features of the landscape, and (b) results in the Project site being only one element in the larger regional landscape; and (3) rolling topography that occasionally blocks views from Otay Mesa Road/SR 905 both east- and westward, and north- and southward. Drivers stopping at the end of Otay Mesa Road to turn left and continue on Alta Road (the closest "through" north-south trending paved road adjacent to most mesa development), on the other hand, would have a clear northeasterly view to the Project, which at its closest point is approximately 0.5 mile northeast of the end of Otay Mesa Road (see Typical View 10, Figure 16, and the simulation, discussed below).

The topographic conditions noted above limit visibility to the Project impact footprint from the undeveloped areas of the San Ysidro Mountains north and east of the Project. The Otay Mountain Truck Trail, a gravel-paved road sometimes used for recreational purposes, transects the San Ysidro Mountains in a generally east-west direction, and has a section located northeast of the Project site; visibility of the Project site from this road is discussed below. The Project site is not visible from locally significant canyons; slopes along the southern edge of the Otay River Valley and the slopes of Johnson and O'Neal canyons block views to the Project site from these areas. Areas north of the Otay River with potential to view the Project site due to elevation are more than seven miles away, muting visibility of any Project features.

4.0 EXISTING VISUAL RESOURCES AND VIEWER RESPONSE

4.1 <u>Existing Visual Character</u>

4.1.1 Visual Character

Visual character is descriptive and non-evaluative, which means it is based on defined attributes that are neither good nor bad in themselves. A change in visual character cannot be described as having good or bad attributes until it is compared with the viewer response to that change. If there is public preference for the established visual character of a regional landscape and a resistance to or a preference for a project that would change or contrast with that character, then changes in the visual character can be evaluated.

The existing visual environment surrounding the Project site is topographically composed of a large, flat mesa area and the foothills and ridgelines of the San Ysidro Mountains. The large, flat mesa areas transition via the lower foothills into the San Ysidro Mountains. The hills and canyons among which the Project site is located provide some continuity between the mesa and the mountains. Due to the vast scale of these dominant geographical features, the Project site appears relatively small, encompassing a portion of the lowest hills at the base of the mountains and the edge of the mesa, particularly when viewed from the mesa west of the site.

Although an overall view encompassing the dominant topographic features generally dwarfs the on-ground elements such as vegetation, buildings, roads, and vehicles, these smaller details create diversity in the area, providing variety in form, color, texture and line. For example, the dirt roads and paths transecting the hills within the Project site and surrounding hillsides show some of the red, white, and light brown coloring of the underlying soil, but are not dominant elements. The texture of the land is predominantly smooth, although some smaller scale scattered patches of rough rock outcroppings are visible. The color and texture of the soil, however, generally is hidden



beneath vegetative cover. In the overall view, the forms of the existing vegetation are indistinct and not dominant but tend to blend together. Some patches of round, asymmetrical, short shrubs are scattered on the hillsides, interspersed with amorphous low-growing plants; low-growing grasses cover the flat, lower undeveloped areas of the mesa and foothills. Some taller, more densely spaced vegetation is growing near the Calpine power plant and in other patches on the mesa near the Project site.

Heavy industrial uses are sited immediately west-northwest and west of the Proposed Project, as shown on Figure 3. These are the Calpine and Vulcan facilities. The Calpine power plant on the lot abutting the northwestern portion of the Project site is dominated by large, geometric structures between approximately 26 feet and 130 feet high. These structures include exhaust stacks, water storage tanks, buildings, and ancillary equipment that are generally earth toned or metallic in color. The heat recovery steam generator(s), (RSGs) are 160 feet in height. An approximately 9-foot-tall earth-toned fence surrounds the power plant site. Although smaller in scale than the topography to the east, the power plant nonetheless is a dominant element in any views toward the Project site, due to the relatively large vertical scale of the power plant structures and their clearly engineered nature (see View 1 [Figure 12]), View 7 [Figure 15], and View 10 [Figure 16]). West of this is the smaller Pio Pico Energy Center, with similar but less dominant features (see View 5, Figure 14).

Immediately west-southwest of the Project is another heavy industrial site, the Vulcan Materials Plant (shown in Views 8 and 9 Figures 15 and 16, respectively), which has separate concrete and asphalt components on the site. The batching components within the Vulcan facility are structurally similar to the power plant structures, comprised of geometric towers, concrete processing equipment, and storage structures that range in color from yellow to muted gray. The equipment and structures are located within the center of the site, while the periphery is graveled and/or earthen to facilitate earth-moving vehicles. The only structures existing on the Project site are the tall SDG&E power lines with complex, geometric latticework. These structures are regularly spaced, providing a sparse but even and ordered texture. The lines within them are straight and are mostly vertical, with some horizontal and diagonal elements within the latticework providing a complex texture. These structures are dark and metallic but are not a dominant feature in the view.

These facilities add a dominant diverse note to an otherwise open view. The verticality of the power plant towers and structure massing, as well as uniform streetscaping in an area otherwise "natural" in habitat, are notably different in form, line and color from the hillsides.

The industrial areas further west also support street-trees and other landscaping. There is no dominant vegetation visible among the vegetation or between vegetative types, rather the lines within the vegetation are broken, diffused, simple, soft, amorphous and diverse.

The vegetation provides the dominant color in views of the mesa and mountains, and mostly includes tans, browns, and yellows for most of the year, and gray-green with some areas of color in the spring time or following rain. The vegetation on the slopes of the mountains transitions to taller, darker shrubs. Some smaller-scale patches of green, including very dark green, are also visible, particularly within the more formalized landscaping on developed properties, such as near the power plant. The muted colors of the on-site vegetation are light, and generally continuous



with the browns and tans of the vegetation in the natural hillsides and the lighter tans of the grassy flat areas of the mesa.

The industrial buildings dispersed across the flat portions of the mesa are interspersed with a large number and variety of vehicles, particularly within the auto auction yard. The industrial buildings on the mesa generally are low (less than three stories high), sprawling buildings surrounded by parking lots. Landscape planting and streetscape trees provide some dark green color that offsets the mostly white, gray, and neutral colored buildings. The natural vegetation in these areas is visually unobtrusive and has been replaced by industrial development and expansive graded areas where industrial development is proposed (see View 3, Figure 13, and View 6, Figure 14).

4.1.2 Visual Quality

Visual quality is evaluated by identifying the vividness, intactness and unity present in the viewshed. This approach to evaluating visual quality can help identify specific methods for mitigating adverse impacts that may occur as a result of a Project. The three criteria for evaluating visual quality can be defined as follows:

- *Unity* is the visual coherence and compositional harmony of the landscape considered as a whole. It frequently attests to the careful design of individual components in the landscape.
- *Intactness* is the visual integrity of the natural and man-made landscape and its freedom from encroaching elements. It can be present in well-kept urban and rural landscapes, as well as in natural settings.
- *Vividness* is the visual power or memorability of landscape components as they combine in distinctive visual patterns.

The undeveloped areas within and surrounding the Project site have high visual unity, due to the visual coherence of the limited visual components (e.g., the low-growing vegetation). When combined with the structures and landscaping immediately abutting industrial facilities, however, high levels of unity and intactness are lost. The power plants and Vulcan batch plant provide vivid visual notes that vary from the natural landscape in color, scale and line. Their presence tends to emphasize the industrial lines and color of the transmission line route crossing the property where both are in the same view.

The visual unity of the industrial areas further west of the site is moderately high; although the buildings generally adhere to the local design guidelines and therefore are visually similar to each other, the trees and landscaped areas, where present, contrast with the buildings, parking lots, and vehicles.

These developed areas are not designed to integrate with the grassland areas, nor the mountains, and where the developed and undeveloped areas converge at the border of the Project site, the components visually contrast with each other, and diversity is higher. The coherence of these components, and therefore the visual unity, of the area is low to moderately low, depending on the viewer's location and which of the above elements are in his view.



The undeveloped areas in the vicinity generally exhibit moderate visual continuity, with moderate topographic diversity as the flat mesa areas transition into the foothills and canyons of the San Ysidro Mountains to the east with gradual changes in scale. Dirt roads and trails crossing the area can be highly visible. Some trees and shrubs are present, and tend to highlight the rolling, monotone nature of the grassy areas. Accordingly, there is moderate variation in line, form, color or texture. The mountains have high visual intactness; they are free from buildings or other developed aspects that would otherwise distract from their visual dominance. The power lines that extend through the Project site, as well as most other structures noted above, are tall when in the foreground of a view, but visually dwarfed by the dominant hills from most vantage points within the viewshed. The industrial uses west of Alta Road, though visually composed of diverse elements, are also highly intact; Otay Mesa has design guidelines that regulate the look and character of the buildings and landscape treatments. Though directly bordering each other, the distinct change from undeveloped to developed visual environments tends to heighten the visually intact character of each within itself. Overall, a moderate to moderately high level of intactness is assessed.

The expansive undeveloped grassland areas can be memorable as open space at the base of the San Ysidro Mountains. The San Ysidro Mountains and foothills are visually dominant and memorable. In contrast, the developed areas have low visual vividness; excluding the notable forms of the power plants, the buildings are neither unique nor memorable, and taken together they do not comprise a distinctive space. Generally, the openness of the landscape allows a viewer in many portions of the viewshed to observe these disparate elements at the same time. The visual combination of the low vividness of the developed areas, the moderate vividness of the grasslands, and the high vividness of the abutting mountain range results in a moderate level of vividness for the Project site.

Taken together, the low to moderately low unity, moderate to moderately high intactness, and moderate level of vividness, combine to suggest that the Project site has moderate visual quality.

4.2 Viewer Response

Viewer response is composed of two elements: viewer sensitivity and viewer exposure. These elements combine to form a method of predicting how the public might react to visual changes brought about by Project implementation.

Viewer sensitivity is defined both as the viewers' concern for scenic quality and the viewers' response to change in the visual resources that make up the view. Local values and goals may confer visual significance on landscape components and areas that would otherwise appear unexceptional in a visual resource analysis. For the Proposed Project, viewer sensitivity has been identified based on the analysts' experience in similar settings and County planning documents (i.e., General Plan and EOMSP).

Viewer exposure is typically assessed by measuring the number of viewers exposed to the resource change, type of viewer activity, duration of the view, the speed at which the viewer moves, and position of the viewer.



Viewer awareness: A viewer's response is also affected by the degree to which he/she is receptive to the visual details, character, and quality of the surround landscape. A viewer's ability to perceive the landscape is affected by his/her activity. A viewer on vacation in San Diego County would probably take pleasure in looking at the landscape, and an individual may be strongly attached to the view from his home, but a local County resident commuting to work may not "register" those same visual resources on a daily basis.

4.2.1 Viewer Groups and Sensitivity, Exposure and Awareness

4.2.1.1 *Motorists*

Existing viewers of the Proposed Project site/vicinity are mainly motorists on local streets and workers and visitors to local businesses, industrial operations, and nearby correctional/detention facilities. The existing and projected numbers of motorists on local roadway segments near the Project site are detailed in the Project's Traffic Impact Study (Darnell & Associates, Inc. 2017). The most traveled roadways within the Project viewshed include the east-west trending Otay Mesa Road and Siempre Viva Road, and the north-south trending Alta Road. Generally, the traffic volumes are lower on Otay Mesa Road and Siempre Viva Road near the Project site than along segments further west. Existing roadways such as Enrico Fermi Drive, Sanyo Avenue and Airway Road, located southeast of the Project site, are lesser traveled roads. Specific to roads with views toward the Project, the segment of Otay Mesa Road between Enrico Fermi Drive and Alta Road, the segment of Alta Road between Calzada de la Fuente and Otay Mesa Road, and Calzada de la Fuente, carry average daily traffic (ADT) of up to approximately 9,065, 7,913, and 1,196 respectively (Darnell & Associates, Inc. 2017).

Excluding the few residents driving toward their homes, or few recreational motorists driving toward the Otay Mountain Truck Trail (see discussion below for both viewer groups), motorists accessing the automobile/equipment yards, prisons, detention center, mining area, or construction projects in the vicinity are expected to be focused on getting to their destinations rather than driving these roads for aesthetic purposes. Especially for those driving to access their regular place of employment, viewers would already be conditioned to expect construction activities and large-scale ground disturbance as part of their existing daily view. Sensitivity to an additional construction project is anticipated to be relatively low.

Motorists' sensitivity overall is mixed. Motorists on roadways within the Project vicinity are likely to be regular visitors to the area with their attention primarily focused on their respective destinations. While motorists may be appreciative of the views available from these roadways – particularly to the east where views of the mountains are more pronounced – they generally are not seeking a recreational experience or scenic views while using these roadways and their sensitivity would be low to moderate. Recreational motorists on the Otay Mountain Truck Trail would have moderate to high sensitivity, as they are expected to be generally more sensitive to modifications to the existing setting, particularly any change from a more to less "natural" experience. Border patrol agents or maintenance workers along the SDG&E transmission facilities, while focused on the access road and (potentially) the views from area dirt roadways, are not be considered as having the same sensitivity as recreational motorists. Accordingly, sensitivity of existing viewers in the area is moderate to moderately high.



The *exposure* of existing motorists on local roadways depends on the roadway on which they are traveling, and in which direction. For example, motorists on roadways closest to the Project site, including Paseo de la Fuente, Alta Road, Enrico Fermi Drive and the eastern extent of Otay Mesa Road, potentially have high exposure when in the viewshed, on segments where easterly views are not obscured by existing structures, and when driving with views toward the Project; their exposure is moderately high. Existing local roadways southwest of the Project site extend between buildings and developed lots, and provide few views of the undeveloped areas within and near the Project impact footprint; motorists on these roads have low exposure to the Project.

Although drivers passing through the area are expected to note Project-related changes to the existing visual environment, their primary focus is expected to be on speed of travel, interaction with other drivers on the road, and reaching their destination. This, combined with both the relatively short duration of exposure time and the number of competing visual elements in the expansive viewshed, is expected to lessen the importance of specific view elements for this group of viewers. Speed and traffic conditions would comprise an element of distraction from passenger views as well, but it generally would be less than for the driver. In these cases, passengers within the vehicle could be more focused on and have a greater awareness of the surrounding viewscape. The *awareness* of motorists' on local roadways would be moderate.

Motorists using the Otay Mountain Truck Trail also would have moderate awareness of views that include the Project. While they may be aware of the available views, unless stopped at an overlook point they presumably would be focused on the rugged roadway. The reader is referred to additional discussion below under Recreationalists.

4.2.1.2 Recreationalists

There are no public parks in the vicinity of the Project site. The closest mapped recreational parks include the Lower Otay Lakes County Park, located approximately 2.3 miles northwest of the Project impact footprint, and the Otay County Open Space Preserve, located less than a mile northerly of the Project impact footprint. These two San Diego County facilities are located within the Otay River Valley. Due to their distance from the project site and intervening topography, these canyons do not provide views to the Project/.

Panoramic views of Otay Mesa are available from parts of Otay Mountain Truck Trail. The Otay Mountain Truck Trail is a graded, gravel-paved roadway used mainly by U.S. Border Patrol agents. Mountain bikers and off-road vehicle motorists also use this road. It provides access to and across the BLM land neighboring the Project impact footprint and the wildlife conservation area at Otay Mountain, designated as federally protected Wilderness Area. Recreational users of this road (motorists, bicyclists and hikers) have high *sensitivity*, as they generally are seeking a scenic recreational experience. As a result, they are expected to be sensitive to Proposed Project modifications to the existing setting, as well as, potentially, any change from a more to less "natural" experience within their sight lines.

While the speed of travel of recreationalists on the Otay Mountain Truck Trail often is slow, necessitated by the unpaved and winding condition of the road, viewer *exposure* from this roadway is low, due to the low number of users, the intervening topography which blocks many potential views to the Project, and the few overlook areas available on the roadway.



Hikers and bicyclists using the Otay Mountain Truck Trail would have moderate *awareness* of the surrounding area and the available views, including those that encompass the Project. These recreationalists would have a longer duration of time to view the surrounding area than motorists; however, because the surrounding area is a mix of undeveloped and developing areas with obvious large-scale construction activities, hikers and bicyclists also may not be highly aware of changes to the existing environment.

A multi-purpose trail is located along the north side of Calzada de la Fuente, turning north along the property boundary of the CCA Otay Mesa Detention Center northwest of the Project. Pedestrians, equestrians and bicyclists may use the trail, although a sidewalk is present along Calzada de la Fuente. These viewers, though low in number, could have a higher sensitivity to the visual environment, as they could be seeking a recreational experience. Nonetheless, such viewers, when present, are expected to be focused on the open, undeveloped areas north and east of the Project site. They would not be expected to look southerly for open space recreational views due to the presence of the existing power plant. As depicted on the EOMSP Land Use Plan, the trail heads northerly from Calzada de la Fuente to O'Neal Canyon, located at lower elevations than the mesa hills, and dropping down into the Otay River Valley to the northwest.

Similarly, dirt roads used primarily by off-road vehicle drivers leading toward Johnson Canyon are located over one mile west of the Alta Road/Calzada de la Fuente intersection (in the vicinity of the Harvest Road and Lone Star Road intersection). No formal trail is located here, and user numbers are unknown, but expected to be low. Their focus (besides vehicle management) would be expected to be on descent into Johnson Canyon, away from (and downslope from) the Proposed Project site. For vehicles exiting the canyon, these viewers would have a broad viewscape incorporating numerous built elements, including structures closer to them, as well as the intervening major industrial visual element of the power plant. Sensitivity of these potential viewers to the site, therefore, also would be low. Potential use of these tracks is not addressed in further detail.

4.2.1.3 Residents

As discussed above, several private residences are located within two miles of the Project impact footprint. Residential viewers are usually sensitive to changes in views from their homes as they are very familiar with these views and have the potential to view them for long periods.

Residential viewers are expected to have moderately high *sensitivity*, due to their familiarity with the area and their concern for the composition of the view from their homes. The highly varied nature of the surrounding environment surrounding these residences, composed of both undeveloped natural areas and dominant industrial areas between the site and these residential viewers, would reduce residential viewers' sensitivity to change.

Residents are expected to be extremely aware of changes associated with Proposed Project improvements. Additionally, since the surrounding area is a mix of developed and undeveloped areas, residential viewers may not have a high expectation for extensive views of undeveloped or highly vivid areas that would attract prolonged attention. Thus, residents' *awareness* is moderately high.



While the group of residents within the Project viewshed is small, these viewers have high *exposure* to views of the surrounding area due to their long-term, stationary views and would be aware of changes in their vicinity. Each of the residential properties within two miles of the Project impact footprint, however, would have obscured views toward the site that are either partially or entirely blocked by small hills, buildings, and/or vegetation.

Based on the EOMSP Land Use Plan, area identified for future for Rural Residential (20-acre lot) uses on the EOMSP is shown for the Project area, as well as small areas to the north and south. As such, it could be expected that a small number of potential future residential viewers could be located in the area identified. As shown on EIR Figure 2-1, Proposed Specific Plan Amendment, however, the Project would re-designate parcels within the impact footprint to a Mixed Industrial category, eliminating potential for residential lots following reclamation in this industrial part of the County. Other areas would be re-designated Conservation/Limited Use. In the northern area, additional land located between the Project and the existing detention center was granted in open space to the California Department of Fish and Wildlife in 2009, effectively eliminating potential for large-lot residential within the EOMSP area in this location. This area is also under the G Designator overlay zone, which applies Sensitive Resource Area regulations to further protect sensitive resources. In the south there are two small portions of future Rural Residential identified in locales immediately south of the Proposed Project and east of future U.S. Port of Entry near the border. Both of the areas are bordered on the east by identified Landfill Initiative and are located within Landfill Buffer Overlay. No homes are currently located in these areas, and no further discussion is provided under existing conditions.

4.2.1.4 *Other Private Viewers*

Views may be possible from the industrial facilities within Otay Mesa, especially from buildings and lots on the eastern edge of the developed areas. However, few of these buildings have windows, and views from these areas generally would be industrial in nature, including parking lots and sparse landscaping in the foreground. The viewers in this area are not considered sensitive and are not further included as a viewer group in this analysis.

5.0 VISUAL IMPACT ASSESSMENT

5.1 **Guidelines for Determining Significance**

The following significance guidelines are taken from the County 2007 Guidelines for Determining Significance and Report Format and Content Requirements, which guide the evaluation of whether a significant impact to visual resources would occur as a result of Project implementation. A Project would generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a Project does not propose any of the following, it would generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect.

1. The Project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style,



setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.), or by being inconsistent with applicable design guidelines.

- 2. The Project would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), historic resources, trees, and rock outcroppings.
- 3. The Project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:
 - a public road,
 - a trail within an adopted County or State trail system,
 - a scenic vista or highway, or
 - a recreational area.
- 4. The Project would not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's Zoning.

Additionally, a Project may contribute to a significant adverse cumulative effect even if the Project itself does not cause a significant adverse impact. Thus, potential cumulative impacts also must be evaluated for the first three guidelines.

5.2 Key View

The criteria consulted for key view identification included the following considerations:

- Type of viewers and their sensitivity and exposure simulations generally are prepared using views available to the public rather than privately available views due to access issues and the generally higher viewer exposure (a greater number of viewers makes the view more sensitive)
- Scenic status of local roadways and recreation areas where highly sensitive viewers may be present
- The amount of time (duration) and/or number of times observers are exposed to the view
- Breadth of the view a more encompassing viewpoint generally provides a more realistic representation of commonly available views, and often includes multiple elements rather than focusing on a specific criterion
- Depth of the view a short distance may provide detailed views of one element, while an increased distance both includes more elements and makes them appear smaller and less detailed, although visibility may be affected by atmospheric conditions such as fog, smog, etc.



Based on these considerations and consultation between the visual analysis team, the Project proponent, and County staff, the key view selected for simulation was from the intersection of Otay Mesa Road and Alta Road.

This view is representative of public views visible to motorists travelling eastbound on Otay Mesa Road and includes typical visual features of the undeveloped landscape, the transition from mesa to mountains, and scattered industrial development in the immediate vicinity of that transition. It demonstrates the quality and character of the existing setting as being an area in transition toward increased industrial development, but with substantial visual importance still allocated to the natural setting. This location represents a broad public vista and a readily available view due to the traffic stop at the intersection (Typical View 10, Figure 16). It would provide the clearest views to the site for the greatest number of viewers with the greatest range of visual expectations (e.g., motorists at this location could be associated with any number of activities and therefore have the widest level of sensitivity), and, because of the stop sign, also would provide for more than lateral exposure to the site. Assuming continuation of existing visual conditions and no construction of intervening uses under the EOMSP, it provides the full breadth of the view available to the site during the full 22 years of phased activity along these slopes. The Projectrelated change to this key view is depicted and discussed below in Figure 24, Visual Simulation of View Eastward from Otay Mesa Road Terminus at Alta Road, which simulates the Project following reclamation of the slopes up through complete closure. Changes to character and quality, viewer response and resulting visual impact are addressed in Sections 5.3 through 5.6, below.

Views considered but not selected include views from nearby trails to the east of the Project site due to the low number of viewers, restricted public access to some of the trails, and lack of dominance in view due to being below the viewer (Representative Views 1 and 2, Figure 12). The typical views from Paseo de la Fuente and Access Road (Typical Views 7 and 8, Figure 15) were not selected because of the relatively low number of viewers and the assumption that viewers from these vantage points would be employees of the Proposed Project, the power plant, or the batch plant. All of these viewers would be focused on getting to work at an industrial plant and would not be expected to be highly sensitive to Project visual effects. The typical view from the terminus of Airway Road (Typical View 11, Figure 17) also was not selected because, although a public roadway with a moderate number of viewers, views from this location are similar to those from the intersection Otay Mesa Road and Alta Road, but would have fewer viewers and be sited at a greater distance from the Project site. Other typical views presented in this report are indicative of the existing conditions of the areas surrounding the Project site and are not representative of views to the Project site itself; thus, these views were not chosen as key views based on the criteria above. Refer to Figure 11 for the location of these views on an aerial photograph.

5.3 Assessment of Visual Character and Quality

This section addresses the proposed changes the Project may cause to the visual character and quality of the visual environment of the Project site and the Project viewshed, and the potential response of viewers to those changes.

The Proposed Project would be located in the sparsely populated, partially undeveloped EOMSP Subarea 2, with primarily industrial uses prevalent to the west and south, and primarily undeveloped BLM land to the east and north. The Project site exists within a larger view that



encompasses the mesa, industrial and commercial development, and the foothills and peaks of the San Ysidro Mountains. The most important visual elements currently include the disturbed grasslands between development and the mountains, and the San Ysidro Mountains themselves. An additional notable element in the current view toward the Project is the Calpine Power Plant. Each of these elements is depicted in Views 1 through 11 in Figures 18 through 23. These figures provide the representative or typical views described above in Section 3.2 of this report, but also schematically represent the Project impact footprint for reader reference). Please note that view identifications match those in Section 3.2, above, for ease of reference. Specific view reference numbers have not been changed to account for deletion of existing conditions views that are not included within the impact discussion (e.g., due to not being within line-of-sight toward the Project, or where the view normally would not be seen by the general public such as into Vulcan Materials).

The more focused Project impact footprint would be located in a developing portion of the mesa where it meets the foothills of the San Ysidro Mountains. The visual character and quality of the area largely draws from the visually distinctive flat mesa areas and the rolling topography of the mountains, and the diverse developed areas which provide additional variety in form, color, texture and line.

During operation of the Proposed Project, earthmoving and aggregate processing equipment and the soil and rock exposed on the slopes and pads of the impact footprint would change the patterns of the visual environment on and near the Project site. The final configuration of slopes and pads post-reclamation also result in changes to the existing visual patterns.

Project operations would be located above grade and visible for a number of years. More detailed information on phasing is presented in Section 2.1 of this report. In summary:

- Phase 1, site preparation, would last one year, would be located in the approximately 16.1-acre northernmost portion of the Project, and would include preparation of pads to support the processing plant and provision of site utilities. The processing plant includes a primary crusher, a HMA plant, an aggregate processing plant, a concrete ready mix plant and a recycling plant (see Figure 5).
- Phase 2, extraction to natural grade elevation, would be broken into three sub-phases (moving north to south) south of Phase 1, with activities anticipated to take 5, 6, and 11 years, respectively, for a total of 22 years.
- Phase 3, open pit extraction, would be located in the area of Phase 2, but would excavate down to approximately 525 feet below grade in four north to south overlapping phases, with backfilling beginning as excavation is complete within areas. Timing of the four phases is anticipated to be 3, 16, 18 and 31± years each, for a total of approximately 68 years. Equipment shown at the south end of Figure 5, including the recycling plant and primary crusher, is portable and would be relocated to the quarry floor as excavation progresses below grade.



• Phase 4, IDEFO (landfill) would complete (subsurface) backfilling within that would largely overlap with Phase 3, and then extend for approximately another 16 years following cessation of extraction efforts for final revegetation and monitoring.

5.3.1 Assessment of Visual Character

As discussed above, the Project impact footprint is located in a developing portion of the mesa where it meets the foothills of the San Ysidro Mountains. The visual character and quality of the area largely draws from the visually distinctive flat mesa areas and the rolling topography of the mountains, and the diverse developed areas which provide additional variety in form, color, texture and line. During operation of the Proposed Project, earthmoving and aggregate processing equipment and the soil and rock exposed on the slopes and pads of the impact footprint would change the patterns of the visual environment on and near the Project site. The final configuration of slopes and pads post-reclamation also result in changes to the existing visual patterns. These changes would be visible from public vantage points, such as Otay Mesa Road, Siempre Viva Road, nearby recreational trails, and Otay Mountain Truck Trail.

The equipment, which would be light in color, and the exposed soil, which would be lighter in color than the surrounding existing vegetation, would be visually dominant elements due to their high contrast with the existing visual environment. These incompatible elements would be notable on the eastern edge of the developed mesa areas, such as the points represented in the photographs. The inconsistency would become less noticeable as the viewer moves farther west. Where seen between buildings and/or distinguishable in the distance, the elements would not contrast as strongly with the industrial nature of the developed areas.

Additionally, the operational equipment and exposed soil in any specific area would be visible temporarily – the slopes would be revegetated as each phase is complete. Post reclamation (see the simulation, Figure 24), the equipment would be removed. Slope revegetation would reduce the visual contrast of the exposed soil with the surrounding area. The steep, rocky slopes with benches would support sparser vegetation than the existing vegetation, however, and the slopes would appear more manufactured in configuration. In accordance with the design measures included in the Reclamation Plan, exposed rock outcroppings would be stained and the proposed vegetation would be planted, which would provide some softening and screening. These design measures would lessen the dominance of the newly formed slopes such that they would not be visibly incompatible with the existing visual character.

The Proposed Project operation would not introduce visually different large-scale elements into the visual environment. Just to the north of the mining area, an approximately 16-acre parcel would contain the processing facilities schematically depicted in Figure 5 and described in Section 2.1, *Project Components*, above. Structures would generally be between 30 and 45 feet in height, with the tallest structures being up to 75 feet in height. The tallest silos would be associated with the hot mix asphalt area (mid-point on the structural lot). Others would be located at the northern extent of the structures lot as part of the concrete ready mix facility adjacent to the office. Both of these locations would be in the portion of the Project due east of the power plant. For viewers from the northwest and west, these would be dwarfed (and to some extent shielded) by the mass and height of structures and stacks at the power plant, which exceed 130 feet in height. They also



would be consistent with equipment at the batch site. The Project would not extend higher than the horizon line as mountains comprise the background.

The introduction of the Project facilities would not add contrast to the existing view as it would be sited immediately adjacent to, and largely "behind" the existing power plant. There would be some increase in vertical lines related to the silos, but the overall forms would be similar, although lower, than those existing. The Proposed Project would not change the existing dominance of the power plant.

The slopes that would be created by the Proposed Project would not break the horizon line in views of the Project site and surrounding area from the west. Additionally, the Proposed Project would be visibly smaller the further west the viewer is sited. Generally, while the Proposed Project impacts ultimately would encompass all 110 acres, the final slope configuration would not be out of scale with the surrounding area.

The Otay Mountain Truck Trail, from which westward views are available, is closer to the Project site than viewpoints west of the site. Although the equipment and structures of the site would be visible, above-ground elements of the neighboring power plant would be larger. Additionally, the Project impact footprint is lower in elevation than the truck trail, and the mesa that comprises the background in westward views would remain visibly dominant and is a much larger scale element than the Proposed Project. Therefore, the scale of the Project elements during operation and after reclamation would not be incompatible with the existing visual character.

The Proposed Project would introduce new elements – structures and equipment during the operation of the Project, and new, steeper slopes with benches – into both eastward and westward existing and future public views; creating more diversity. During Project operation, the lightly colored equipment and exposed soil would comprise new and contrasting elements of diversity, which would be incompatible with the hills and mesa areas immediately abutting the site. They would be more compatible, however, with the industrial areas to the west. They also would not be permanent.

While the entire program would take a substantial period of time (approximately 120 years), the disturbance areas would move within the site, and largely would be focused on extraction that would actually extend downward (to a depth of approximately 525 below grade) or to fill of those areas that had already been excavated. This means that after a less than 25 years, much of the activity would be below grade. As described above, these activities would not take place within a pristine visual environment. The site contains existing mining activities, and other industrial uses such the adjacent power plant. Additional heavy industrial uses (by others), are planned for lots south of the power plant and east of Alta Road, thereby screening Project activities. As described in Section 2.1, above, closer to the mine, perimeter planting would screen Project activities from Calzada de la Fuente, and 100-foot wide vegetation swaths would surround on-site structures or processing equipment areas.

Also as described in Section 2.1 of this report (and schematically shown on Table 2-2 of the EIR, the fill activities begin only a few years into the excavation program. As noted at the beginning of this discussion, the operational equipment and exposed soil in any specific area would be visible temporarily – the slopes would be revegetated and exposed raw rock would be stained as each



phase is complete. (As described in Section 2.1, reclamation would commence upon completion of each phase, with final reclamation including final grading of final land forms, removal of plant equipment, application of topsoil resources, and revegetation.) Overall, although the length of the Project exceeds that of a residential or commercial construction period, it also varies from such projects in that: (1) it would occur on an already disturbed site containing similar activities as part of the existing condition, and (2) construction activities would move around the site, creating more focused disturbance areas at any specific point in time. These result in the Project being a continuation and focused intensification of the existing condition, but not substantially different. In addition, such industrial uses are anticipated in this part of the County and are planned to cover an even larger portion of the immediate vicinity than they currently do. In and of itself, the length of time of the Project does not result in incompatibility with the existing visual environment. That visual environment is expected to remain and expand, continuing to be consistent with the Project.

The slopes, steeper than the existing slopes and with horizontal benches, would be the most visible part of the Proposed Project. The northern 16.1-acre parcel generally would be shielded from eastward looking views by the existing power plant, and where visible, would visually merge with existing components of that facility. This is not true for the slopes extending to the south. Cross sections have been prepared to illustrate proposed modifications to existing landform/grades (see Figures 7 through 9d. Following excavation and backfill phases shown on those figures, slopes would transition into existing surrounding slopes; the height of each would be broken by benches, or flat areas a minimum of 6 feet wide, located every 25 vertical feet for structural purposes. The top of the slopes would not be silhouetted, and the slopes would be rounded as a transition into the existing hillsides to provide continuity with the surrounding foothills. The hillsides and mountains in the background would remain undisturbed and visible within views from the west.

Post-reclamation, the slopes, while still distinguishable, would visually reference and be compatible with surrounding areas due to the similar vegetation and the staining of exposed rock. The Project impact footprint on these modified slopes would consist of similar types of elements to those that currently compose undisturbed parts of the view (i.e., sloping landforms and somewhat sparse vegetation). The diversity post-reclamation, therefore, would not be incompatible with the existing visual environment.

The visibility of the potential changes from points to the west of the Project site are represented in Figure 24, a photosimulation that depicts the Proposed Project landform configurations after Project operation and reclamation is complete. The "existing conditions" photograph was taken from the intersection of Otay Mesa Road and Alta Road. The existing signs and end-of-road barriers at this terminus of Otay Mesa Road are not shown in the photograph, although these would be foreground elements for drivers at this intersection unless the road is extended eastward. The foreground of the photograph is comprised of undeveloped lots vegetated with grasses and low-lying shrubs and dirt access roads. The power plant, batch plant and other nearby industrial development are visible in the middle ground of the photograph. The foothills and mountains within the San Ysidro mountain range compose the background of this photograph.

Traffic volumes on the segment of Otay Mesa Road, approximately 0.5 mile west of the Project site, are approximately 9,065 ADT. Otay Mesa Road ends at this point, and Alta Road provides northerly access to the commercial businesses at Kuebler Ranch, the prison facilities, and the power plant, as well as uses south of the Calzada de la Fuente. The bulk of the traffic at this



intersection, therefore, presumably consists of workers at the power plant, batch plant, and prison facilities; visitors to the prisons; and patrons of the restaurant at Kuebler Ranch (which is currently closed). These motorists are not highly sensitive viewers, as they generally would not be recreational viewers, although their expectations of a scenic eastward view and knowledge of the area may be high due to their familiarity with the area.

The simulation (Figure 24) depicts the Proposed Project's topographic configurations after all phases of the extraction operation and reclamation have been completed, and prior to any other use being placed on the parcel as the site is completely empty. In reality, it shows the modified slopes as they would appear following completing of reclamation activities following completion of Phase 2, far earlier in the Project's timeline. The low (in elevation) activities associated with below-grade excavation, refill, final pad preparation and ultimate revegetation of the pad, would be smaller in scale than the modified slopes, and consistent with trucks and machinery currently visible on the mesa (e.g., at Vulcan). The Project slopes (as represented) would be visible as lighter-colored areas between the flat mesa in the foreground and the mountains in the background. These slopes would be vegetated with species similar to those found in the surrounding area, and exposed rock outcroppings would be stained. The steep and rocky proposed slopes would support sparser vegetation than the surrounding area, however, and therefore are represented in the simulation as less densely vegetated areas. The bench areas also would be visible, as they would reflect light differently from the slopes. The benches are shown in the simulation as lighter-colored horizontal lines.

The Proposed Project would change the profile of some of the foothills whose gentle slopes currently provide a visual transition between the hills and the mesa; however, the long-distance views of the flat mesa areas would not be interrupted by the Proposed Project landform configurations.

5.3.2 Assessment of Visual Quality

The existing vividness of the Project impact footprint area currently is comprised of the undulating, flowing lines of the mountains and the expanse of the mesa area, and the contrast existing between them. The Project is located where the lowest hills provide a transition between the flat mesa and the high mountains.

During Project operation and where visible, the anticipated lightly colored equipment, the exposed tan soil without vegetation, and darker volcanic rock (where excavation actually reaches volcanic deposits), would be contrasting, and could be strongly contrasting, elements that would interrupt the continuity of the flowing lines between the mesa and the mountains. These elements would draw the viewer's eye and provide a distracting element from the overall visual composition of the area but would not substantially affect the overall vividness (level of memorability) based on the much larger size of background foothills and mountains, and their unaffected open space above the grading footprint.

From the east, the Proposed Project would cut away some of the slopes visible in westward views, such as from Otay Mountain Truck Trail, but the elements would be below the viewer, not in the foreground, and would not interrupt the vividness of the view toward the west, or the dominant background mesa.



From the west, the unity of the area is created by the vegetation that provides visual transitions between the mesa and the mountains, and the repeating, undulating lines of the hills as they rise toward the taller mountains in the east. The contrasting elements that would be introduced by the Proposed Project operations would remove portions of the vegetation within the Project impact footprint, damaging the visual order of the area through the introduction of wide expanses of exposed soil and rock. These changes would be smaller in scale than the dominant elements that comprise the visual composition of that area, and therefore would not degrade the overall unity of the area. The site reclamation would soften the contrast created by the exposed soil and would ensure that the Proposed Project slopes would be more compatible with the existing vegetation on the hillsides and pads abutting the Project site. The relative scale of the Proposed Project also would ensure that the overall unity within the larger visual landscape is not degraded.

As reclamation occurs by phase, operational contrast in any specific Project locale would be lessened due to the staining and vegetation required under the Reclamation Plan, although the slopes would still be noticeable. The smaller scale of the Proposed Project elements in relation to the mountains and mesa that comprise the vivid elements of the overall view would ensure that the Proposed Project post-reclamation would not impact the overall vividness of the area. Additionally, the Proposed Project elements would not interrupt views of the largest, silhouetted mountains; these would continue to provide the dominant background in eastward views of the area.

5.4 Assessment of Viewer Response

Viewer sensitivity can be affected by the viewer's perception of the Project's appropriateness within a landscape. As the primary above-ground components of the Project (i.e., aggregate extraction and processing equipment) would be largely obscured in easterly views from locations west of the Project by the existing adjacent power plant and would be similar to (or smaller than) the power plant and batching plant structures in scale and design, and would continue earth moving activities already occurring at the batch plant, most motorists on nearby roadways would be expected to demonstrate low sensitivity to additional structures and grading proposed as part of the Project. Other viewers, such as individuals on the way home, recreationalists accessing or on the Otay Mountain Truck Trail, and perhaps visitors to the prison facilities, could be more sensitive to Project changes, due to their interest in retention of existing conditions and potentially greater levels of exposure. The resulting visual impact of the Proposed Project is a combination of the proposed changes combined with anticipated viewer response, as discussed below relative to specific guidelines.

The Proposed Project would be located in the sparsely populated, partially undeveloped EOMSP Subarea 2, with primarily industrial uses prevalent to the west and south, and primarily undeveloped BLM land to the east and north. The Project site exists within a larger view that encompasses the mesa, industrial and commercial development, and the foothills and peaks of the San Ysidro Mountains. The most important visual elements currently include the disturbed grasslands between development and the mountains, and the San Ysidro Mountains themselves. An additional notable element in the current view toward the Project is the power plant. Each of these important elements is clearly depicted in Typical View 10, Figures 17 and 22.



As described above, the Proposed Project operations overall would occur for approximately 120 years. During this time, extraction and reclamation would occur concurrently, and areas not yet disturbed would continue to support existing vegetation. As described in more detail below, however, the most visible Project elements would not be dominant in area views for the entire operational period, because the longest excavation period would be mining below grade. As a result, visual effects would be most visible during the 22-year period during which excavation into the slopes edging the mesa east of Paseo de la Fuente would occur as part of Phase 2 (see Figures 16a through 16c).

Beyond slope cuts, and as discussed above in Section 5.3.1, Assessment of Visual Character, extraction operations would include multiple visible elements, including equipment, stockpiles of materials, and exposed soil. Generally, the equipment would be composed of geometric forms, smooth, metallic textures, and bold, regular lines. The color of the structures could be white, light gray, or tan, and may draw the eye due to their contrast with the earth-tones of the surrounding landscape. They also may contrast with structures at the neighboring power plant, which are painted in earth-tones. During operation, equipment and exposed soil and slopes would be visible almost anywhere within the Project impact footprint, and equipment and proposed structures would be visible to varying degrees from the surrounding area.

Although mining equipment can be substantial in size, it would be movable in the location of active cut operations, and much of the more long-term sited equipment would be located in the northernmost portion of the property. The main group of equipment would be placed within the northern pad area, just east of the power plant, and would be most visible from the eastern extents of Otay Mesa Road and Calzada de la Fuente, as well as Paseo de la Fuente, De la Fuente Court, and the Access Road southwest of the power plant, where they would be visually outweighed by the larger power plant facilities. They also may be visible from east-west trending roads further south, such as Siempre Viva, due to the flat topography of the mesa. These latter roads, however, are approximately one mile from the portion of the Project impact footprint where the equipment would be concentrated; consequently, the operational equipment would be smaller and less distinct in views from east-west trending roads south of Otay Mesa Road. This area would be largely obscured from some viewing locations to the west by the Calpine power plant and other built uses in this area. In the southern portion of the Project, the equipment would be subsurface and out of view of at-grade viewers for most of the Phase 3 activities.

The mechanical equipment would be interspersed with stockpiled materials extracted during Project operation. These stockpiles would be geometrically cone-shaped piles up to 35 feet high. The color of the exposed slope and pad areas where Project operation is ongoing also would be expected to vary from the weathered surface soil. This soil would be visible (particularly in areas not yet revegetated), and could contrast strongly with the vegetation and any visible red-toned topsoil in the surrounding areas.

In these areas of disturbance, the equipment, which could be light in color, and the exposed soil, which would be lighter in color than the surrounding existing vegetation, would constitute visually dominant elements due to their high contrast with the existing visual environment. These incompatible elements would be notable on the eastern edge of the developed mesa area. Following that anticipated 22-year Phase 2, equipment movement would still be visible during travel between the processing location and the recessed pit, and a possible conveyor belt extending from the



extraction area to the processing area at the north end, but actual mining activity and associated equipment in that area would be increasingly obscured as the pit grows deeper (ultimately up to 525 feet below surface). They would be more compatible, however, with the industrial areas to the west. They also would not be permanent.

The new visual elements associated with the Proposed Project – structures and equipment during the operation of the Project and new, steeper slopes with benches – into existing and future public views; creating more diversity. These elements would become less noticeable as the viewer moves farther west. Where seen between buildings and/or distinguishable in the distance, the elements would not contrast as strongly with the industrial nature of the developed areas.

The revegetation of manufactured slopes and staining of contrasting cut rock, and (ultimately) the reclamation of flat pad areas would occur as part of Project design and would be implemented during ongoing operations. As described above, the operational equipment and exposed soil in any specific area would not be visible for the life of the Project. As each phase is completed, the exposed slopes would be seeded according to the Reclamation Plan. In other words, Phase 2a would be vegetated as Phase 2b begins, with Phase 2a raw soil being visible for the anticipated five years of mining. As Phase 2b mining occurs, the Phase 2a revegetation would take hold, softening the effect of Phase 2a mining. Similarly, as the anticipated six-year Phase 2b is concluded, seeding would occur in that location, etc. The plant palette outlined in the Reclamation Plan is drawn from existing vegetation communities on the Project site and in the surrounding hillsides. The revegetation of the Project slopes during operation (after each phase) and of the pads post operation would somewhat soften the contrast of color between the exposed soil and the surrounding hills.

Mined slopes would transition into existing surrounding slopes; the height of each would be broken by benches, or flat areas a minimum of 6 feet wide, located every 25 vertical feet for structural purposes. Because the top of Project elevations would be below elevations to the north and east, the top of Project-modified slopes would not be silhouetted. Slopes would be rounded as a transition into the existing hillsides at the base and rim of cut as feasible to provide continuity with the surrounding foothills. The hillsides and mountains in the background would remain undisturbed and visible within views from the west.

5.5 <u>Determination of Significance</u>

5.5.1 Guideline 1: Detract from or contrast with existing visual character and/or quality by conflicting with important visual elements or the quality of the area, or by being inconsistent with applicable design guidelines

Visual Character During Operations

Figure 3 is an aerial that shows the impact footprint within the overall Project boundary, and highlights sample topographic elevations. The figure is included to provide general context regarding the portions of slopes modified relative to the unmodified and increasingly higher slopes to the east. The Proposed Project operation would not introduce visually different large-scale structural or equipment elements into the visual environment. Structures would generally be between 30 and 45 feet in height, with the tallest structures being silos associated with the ready



mix plant and the HMA plant, both of which would be up to 75 feet in height. The tallest silos would be associated with the HMA area (mid-point on the processing plant lot). Others would be located at the northern extent of the processing plant lot as part of the concrete ready mix facility adjacent to the office. Both of these locations would be in the portion of the Project due east of the power plant. The existing ground elevation in this area ranges from approximately 665 to 700 feet amsl, and the processing plant pad elevation would be approximately 676 to 690, approximately 20 feet lower than the terminus of Calzada de la Fuente at the northeast end of the Calpine power plant.

Views from the East and South

There are no existing paved public roads south of the site within the United States—all roads are dirt. Use of these roads is therefore generally expected to be extremely low, and often consisting of individuals focused on work rather than recreation (e.g., border patrol agents, or SDG&E maintenance personnel).

Westward views are available from the Otay Mountain Truck Trail, located east of the Project site. Although the equipment of the site would be visible, above-ground elements of the neighboring power plant would be larger. As described above, the Project equipment and buildings could be up to 75 feet in height, which would be partially screened from eastern viewpoints above the Project, and visually minimized both by the larger Calpine facility immediately to the west and by visual foreshortening that occurs when looking down upon a feature rather than seeing it at grade. Additionally, the open space areas preserved by the Project would intervene between the Project impact footprint and the viewer, and the mesa that comprises the background in westward views would remain visibly dominant and is a much larger scale element than the Proposed Project. Therefore, the scale of the Project elements would not be incompatible with the existing visual character from eastern vantage points.

Visual effects would be minimized from the south due to the slope cut extending north-south. Viewers located on dirt roads/trails to the south who look down upon the project could notice an increasingly more abrupt cut to the slope as excavation continues than occurs with the more gentle grade of the natural slope, but the impact would be in line of sight, and therefore not as noticeable as when viewed "face on" or perpendicularly. Limited potential future views associated with a potential residential lot outside of Project boundaries and within area identified for Rural Residential in the EOMSP could be located south of the Project during operations. The size of the lots (anticipated to be 20 acres per the EOMSP definition of Rural Residential lot size) would result in only one lot anticipated in this southern area and would allow the purchaser to orient the residence as desired.

Views toward the Project footprint from the east are provided in Figure 18, *Representative Views A with Project Footprint*. The Proposed Project impact footprint (approximately 110 acres in all) is delineated on each photograph by a yellow dashed line or shaded area, except where the edge of the impact area would be obscured by topography or vegetation. No physical change would occur to the remainder of the 438-acre Project site, approximately 329 acres, would be placed in biological preserve prior to aggregate recovery operations.



View 1 is from the dirt access road abutting the more southerly portion of the Project. It represents a future closest view to the Project from an area crossed by dirt paths and access roads, including to the SDG&E transmission lines/towers and by current ORV activity. It also represents the worst-case view of greatest impact as the longest period of active mining (either through cutting into the slope or excavating below grade) would be visible, as would the immediately adjacent highest cut slope. The extent of the north-south cut along these western foothills could be most visible. The area highlighted on Figure 18 shows area that would be cut away.

The slopes westerly of, or in "front" of, the viewer would be mined and subject to Project impacts; and areas upslope from the 800 amsl elevation line would be retained in open space. The slopes generally west of the transmission line access road would be cut away to the approximate grade of other mesa heavy industrial uses (e.g., the existing visible Vulcan Plant, Calpine and Pio Pico power plants). Graded and disturbed area (similar to that currently part of the Vulcan Materials plant and adjacent uses) would extend easterly toward the view point, and some of the industrial features associated with the existing facilities would become more visible as the intervening slopes would be removed. Moving and visible excavation equipment also would be located on site (most visible to viewers farther east during initial cuts downward from this point), with potential views into the pit as excavation moves below grade in Phase 3. As the hill is cut away toward the more northern portion of the Project, the processing area of the site (again, similar to Vulcan in nature) would become visible just east of the Calpine power plant, in an area currently obscured by topography, and the Calpine eastern boundary could also become more visible, depending on the viewer's location.

As noted, the area upslope from the vicinity of the access road/800 amsl topographic line would be retained in open space. This would be part of the approximately 329-acre Project fenced preserve area. Proximate views to the disturbance area are expected to be restricted to the immediate area of the access road, and to be viewed by a very restricted number of viewers (e.g., SDG&E maintenance personnel). This is because so many of the dirt trails and roads in these hills are blocked from westerly access, and much of the adjacent property would be placed into permanent, fenced, open space, with no access by the general public if the Project is approved. For viewers located on roads and trails east of the open space, westerly views toward the Project would be either blocked by intervening topography or would generally look over the Project to the valley floor due to their higher elevation combined with horizontal distance from the Project (i.e., the viewer would be unable to physically look down onto the site from an adjacent ridge line when they are set back from the impact footprint). Where visible, transmission towers would continue to provide vertical elements rising above the ground surface at the edge of disturbance, and any visible build or natural mesa elements would continue to be so. Visual impacts would be less than significant due to the very restricted number of viewers from this or similar viewpoints east of the Project.

View 2 (Figure 18) was taken from the Otay Mountain Truck Trail. When this photograph was taken in 2005, access into the hills could be gained from Alta Road to points east. As shown on Figure 11, most of the mountainous area to the north and east of the viewpoint does not have visibility to the site. The Project impact footprint is visible from three areas along this road; View 2 represents an encompassing view from the road to the site and more distant westerly landscape elements. The photograph illustrates a portion of the Project proposed for permanent biological preserve (the hillside on the left of the picture and the draw down toward the mesa), just north of



the Project's easternmost extent into the hills. The impact footprint associated with the northernmost lot of the Project would be visible from here, along with its processing facilities. View 2 shows the dense development of Tijuana, Mexico, and the grading associated with primarily industrial and commercial development west of the Project impact footprint, all of which would remain in the view. The views also include the hills adjacent to the Project impact footprint and retained as permanent open space as a dominant element in the foreground view. Long-reaching views over the flat mesa areas to the west are illustrated. The location of the neighboring power plant is visible, as are other industrial developments in the surrounding area (refer to View 1 for additional depiction of existing development edging the Project). Automobiles in the nearby auction yard are reflective and draw the viewer's attention. Straight lines created by area roadways also are visible in the background.

Overall, the site footprint comprises a relatively small portion of the view from this location. The (1) distance of viewers from the impact footprint at this viewpoint, (2) likelihood of the viewers moving along the dirt road rather than being stationary, (3) elimination of viewers from existing dirt roads/paths east of the Project that would be fenced open space with Project implementation, and (4) encompassing nature of the view overall, combine to render Project visual effects from this viewpoint as visible, but less than significant.

Views from the North and West

For viewers from the north and northwest, the northernmost pad and associated structures (processing plant) would be dwarfed and shielded by the mass and height of structures and stacks at the power plant, which exceed 130 feet in height. The Project would not extend higher than the horizon line as mountains comprise the background. The introduction of the Project facilities would not add contrast to the existing view as it would be sited immediately adjacent to, and largely "behind" the existing power plant. There would be some increase in vertical lines related to the silos, but the overall forms would be similar, although lower, than those existing at the Calpine power plant or the existing Vulcan Plant. The Project structures would not exceed 75 feet in height (the concrete ready mix plant and the HMA plant), with the next highest structure (the baghouse and its ducting) typically standing at 45 feet in height. As described in Section 3.1, above, the tall Calpine towers and large covered structure are located immediately west of the northern portion of the Proposed Project. The towers and other large built structures dominate the eastern-most built portions of the mesa in this area. The Proposed Project would not change the existing visual dominance of the power plant.

The Project would cut into slopes east of the existing Calpine and Vulcan facilities for approximately the northern two-thirds of the Project. The slope cuts would also extend south of those facilities, between 1,100 and 1,200 feet south from the Otay Mesa Road trajectory toward the hills. The existing ground elevation in this area ranges from a low of approximately 575 to 800 feet amsl, at the (isolated) lowest and highest points, respectively, with the majority of the cut area being both higher and lower than these extremes. Cut slopes would rise to elevations of 750 to 800 feet (approximately the elevation of the existing transmission line corridor that cuts across the slopes in a north-south direction, along the eastern side of the Project disturbance footprint). The top elevation of the hill is approximately 1,020 feet amsl. The slopes that would be created by the Proposed Project would therefore not break the horizon line in views of the Project site and surrounding area from the west but would rather top out approximately mid-slope. Further to the



south, where not obscured by intervening uses, they also would be consistent with equipment at the existing Vulcan Materials site. The Proposed Project would be visibly smaller the farther west the viewer is sited. Generally, while the Proposed Project impacts ultimately would encompass all 110 acres, the final slope configuration would not be out of scale with the surrounding area.

Views toward the Project footprint from the north and west are provided in Figures 19 through 23.

View 3 (Figure 19, Representative Views B with Project Footprint) is from the driveway/access to the former Kuebler ranch, currently a commercial/industrial business and Alta Café restaurant. This view shows the Otay Mesa Detention Center just south of a graded pad, the Calpine power plant beyond that on the left side of the photograph, and the Pio Pico Energy Center on the right side of the photograph. Each of these facilities is located at a slightly lower elevation than the viewpoint, which provides some views over them to mesa area to the south (showing as generally developed from this vantage point). The Project property located east of the Calpine facility, is also both at these slightly lower elevations, as well as equal and higher elevations. From this viewpoint, the transmission towers that are generally backed by higher slopes for viewers from the west extend above the horizon. While no Project changes would occur to the areas east of Calzada de la Fuente in the area east of the Detention Center parking lot, south of the towers extending east-west from the Calpine facility, Project mining would cut into the westernmost portion of the visible southern slope, highlighted in yellow. This would change the view from this viewpoint but would be generally consistent with the industrial nature of adjacent development and would be at some distance from the viewer (between approximately 0.5 mile at the closest point and 1.0 mile at the most distant point in line of sight). Naturally rising and rounded hill forms would be seen above the more vertical lower slope, as currently seen and that extend further to the east.

View 4 (Figure 19) is taken from the eastern terminus of Calzada de la Fuente and the northeast edge of the Calpine power plant fence line, looking south-southwest onto Project property. The Calpine fence is visible, as are three transmission tower bases near the viewer. The SDG&E access road visible in the center of the photograph provides a rough edge to the Project's developable eastern boundary at approximately 700 to 800 feet amsl (the road has far more variation in line than the boundary, and the boundary would always be located west of the transmission line towers).

Access to the Project property is not available from this viewpoint; it is both gated and posted for no access. The Project would largely re-designate land uses to Mixed Industrial or Conservation/Limited Use, and this Project would re-designate (or a prior 2009 project has redesignated) EOMSP Rural Residential uses in the area north of the Project footprint to Conservation area and buffer. This is anticipated to remove potential for residential uses to the north of the Project footprint. South of the Project, it is anticipated that one home (on a 20-acre lot per the EOMSP; County 2015:29) southeast of Paseo de la Fuente could be implemented. Depending on exact viewer location, modified slopes would contrast with slopes in the permanent open space located to the east of the mining area both in their modified nature and removal of vegetation prior to revegetation. Although there would be some machinery movement, and the mining would differ in specific effects than the existing condition, based on the potential future home's precise location, it would not vary in industrial nature from the Vulcan facility located adjacent to the Project in this southern area.



Although potentially notable and highly visible from specific locales, there are several factors that would reduce the impact level. The Project may be in operation during any future development of homes in this area (i.e., it would be an existing condition during residence purchase and would not constitute a changed condition during occupation). Regardless, given the potential for only one home based on the required lot size there would be very low exposure for residential viewers. And finally, the 20-acre size of the lot would allow the purchaser to orient the residence as desired, so that if views in another direction are preferred, they could be accommodated, with anticipated distance and slope variation taken into account. The very low number of viewers affected, combined with the ability to orient views, results in impacts being notable for this potential small pool of viewers but less than significant from this locale.

View 5 (Figure 20, *Typical Views A with Project Footprint*) looks east along Calzada de la Fuente, which would provide primary access to the project site but currently dead ends at the Project site boundary. Developed uses along the road include the CCA Detention Center on the north side of the street, and the Pio Pico and Calpine Energy Centers located at grade on the south side of the street. The visible portion of the Project property (north of the processing area obscured by Calpine) would not change from existing conditions – this flatter part of the Project would be left undeveloped, and the portion of the abrupt hills rising behind would be included in the permanent open space. No Project-related change would occur from this vantage point.

View 7 (Figure 21, *Typical Views B with Project Footprint*) illustrates a view from Paseo de la Fuente and De la Fuente Court, approximately 0.15 mile east of Alta Road and 0.25 mile north of Otay Mesa Road. It represents a typical view of the site from the road that provides access to industrial lots to the west of the site. The power plant, roadways and landscaping are the dominant features within this view. Paseo de la Fuente and De la Fuente Court are lined with sidewalks, low-lying, flowering shrubs and street trees (e.g., Mexican fan palms), which provide visual contrast to the earth-toned facilities and the San Ysidro Mountains in the background. The Project impact footprint is visible in the middle ground (shown in yellow/green shading), with wider views available to the hills beyond and above that would be included in biological preserve. Equipment moving across the impact area would draw the eye of passing viewers. The relatively low elevation of cut into the much higher hills from this vantage point, and the abutting developed uses, combined with the moving nature of the viewer along the road, and the nature of the viewer (focused on accessing other industrial uses from Paseo de la Fuente), result in visual impacts from this road being visible but less than significant.

View 8 (Figure 21) depicts a view looking east from the intersection of Paseo de la Fuente and Access Road. The mix of industrial uses and open space on this part of the mesa is visible, but there is currently no disturbance to the slopes at the eastern extent of Access Road directly in front of the viewer. Those slopes would be impacted by the Project, with mining into the slopes extending north and south, east of the graded lot and the Vulcan Materials plant, respectively. As indicated on the figure, Project grading would occur westerly of the SDG&E transmission towers, also visible in the figure (shown in yellow/green shading). This places the visible grading approximately half way up the slopes and below the hilltops and mountain tops that form the horizon. The Vulcan Materials plant walls and vegetation are visible, and from just a bit farther east on Access Road, the equipment and structures can be seen (refer to View 8, described immediately below). Again, Access Road, sidewalks, street lights and landscaping are dominant in the foreground, while the San Ysidro Mountains along with dirt roads and trails are visible in



the background. Project grading is also prominent in this view, and notably different from both the hardscape/landscaped elements and the natural hillsides. Viewers from this vantage point, however, would be accessing either the Vulcan Materials facility or the industrial lots behind the green fencing on the north side of the road. Viewers are expected to be focused on work and to be relatively few in number. Given the context and low number of viewers, visual changes would be notable, but less than significant.

View 10 (Figure 22, *Typical Views C with Project Footprint*) is from the intersection of Alta Road and the terminus of Otay Mesa Road, approximately 0.5 mile to the west of the Project impact footprint. This represents clear eastward views of the visual environment of the site and the surrounding area. Undeveloped land, transected by dirt roads and vegetated by grasses and low-lying shrubs, is visible in the foreground of the view. The Project impact footprint is centered in the photograph and is visible in the middle ground (shown in yellow/green shading), along with the Calpine power plant and batching plant. The closest points of the Project site are also the lowest. The San Ysidro Mountains provide a background for eastward views. This picture provides the most direct and clear views to the entirety of the Project site relative to existing views. Given the much higher elevation of the hills and mountains behind it, the Project appears to be relatively low-lying from this vantage point. Nonetheless, the approximately 190 vertical feet of cut into the foothills would be visible, as would the north-south extent of the Project modifications. Moving equipment might draw the eye and dust plumes would be likely to do the same. These new cuts would be visible from points farther west on the mesa (e.g., from this view point as well as View 10, described below).

While the Project would be notable, the site is located immediately east of an area designated for heavy industrial uses. The grading into the lower slopes would be somewhat minimized by the higher hills behind it and would comprise a larger impact area with visual similarities to the Vulcan materials site immediately west of it. This is because although the Vulcan Materials site is not mining into the hillside, it contains disturbed soil, large piles of variously colored soil materials, and similar equipment types. The greatest difference from this immediately abutting use would be the modification to slope line of the lower foothills, which would introduce straighter line grading into the natural slope, resulting in consistent horizontal bands across the lower slopes and exposure of generally tan soil that would contrast with the low-growing scrub and grasses which are generally more ashy green or brown in tone. Although largely mixed industrial uses are planned to be sited between Alta Road and the Project site in the long term, they do not currently exist, and these changes would be very visible, especially in the short term. Viewers seeing the Project, however, are not expected to be very sensitive to these effects. Viewers would be turning onto Alta Road as they exit a series of industrial uses, and generally would be expected to be travelling north to access either nearby industrial areas for work or to the prisons, with their focus on point of destination. Travelers focused on recreational uses and scenic views are not likely to be on this roadway (or at least not in notable numbers and would be in transit to their destination). Those travelers also generally would access the hills from identified entry points east and north from routes such as Otay Lakes Road. As such, given the consistency with mesa development plans, the existing abutting uses, competing visual elements (adjacent cars and closer grassland views as well as potential distant focus on the mountains) and the low number of viewers who could be traveling for recreational purposes, impacts are considered notable, but less than significant.



View 11 (Figure 23, Typical Views D with Project Footprint) was taken from the eastern terminus of Airway Road, just north of Enrico Fermi Place and east of Enrico Fermi Drive, a little more than 0.8 mile southwest of the Project impact footprint. The closest and southernmost hill would be cut into for approximately half of its visible height, as indicated in the figure. The top of the hill would remain in its current state, and the expansive mountains to the east would continue to provide the most dominant view element in terms of drawing the eye of the viewer. Even during the active mining time period, when moving equipment would draw the eye and focus, the visual effect would not be expected to be significant. This is because: (1) the overall modified area would comprise approximately one-third of the horizontal view and less than a tenth of the vertical view, so that competing view elements would continue to dominate; (2) viewers would see this view as they prepare to turn south from Airway, or onto Airway, with no area to stop and observe the view, and with potential nearby traffic to observe and respond to; (3) viewers are expected to be primarily travelers accessing businesses or border uses in this area as no recreational or residential uses are in the vicinity, thus having a lower rating of sensitivity; (4) the prominent mountains to the east (drawing the eye up) would retain their current skyline; and (5), the site is at some distance, which lessens clarity as to specific activities.

Visual Character During Operations

As described above, these activities would not take place within a pristine visual environment. The site vicinity contains existing ground disturbing batch plant activities at Vulcan Materials, and other industrial uses such as adjacent power plants (Calpine and Pio Pico), as well as other modified lots in the immediate vicinity.

The longest-term and largest built structures associated with the Project would be in the approximately 16-acre northern portion of the Project, containing the processing plant. This area would be expected to remain for the life of the Project, and would include a primary crusher, an HMA plant, an aggregate processing plant, a concrete ready mix plant and a recycling plant. As noted above, these structures would generally be between 30 and 45 feet in height, with the tallest structures being silos associated with the ready mix plant and the HMA plant, both of which would be up to 75 feet in height. The tallest silos would be associated with the HMA area (mid-point on the processing plant lot). Others would be located at the northern extent of the processing plant lot as part of the concrete ready mix facility adjacent to the office. These facilities would largely be screened from the west by the immediately adjacent (equally sized or larger) Calpine facilities and would be consistent in character with the larger and intervening facility. As described in Section 2.1, northern perimeter planting would screen Project activities from the northeast of Calzada de la Fuente. As described throughout this discussion, from the east, the low number of potential viewers would be looking over the facility, and any views toward this northern portion and Project built structures would be seen in conjunction with the adjacent Calpine and (farther west) Pio Pico facilities, with their large buildings and silos. From the south, views toward the northernmost parcel would be at distance, as any potential viewers would be looking through the southern portion of the Project and encompass the Vulcan Materials facility as well. That view is additionally discussed below.

The most visible period for all at-grade viewers (including all of those looking at the site from the west) is the 22-year Phase 2 period when excavation into the foothills at the eastern extent of the mesa would occur. Moving from the south end of the plant equipment and processing pad to the



extraction area at the southern end of the Project, Phases 2a to 2c would be implemented north to south and would be located as shown on Figure 7. During Phase 2a, aggregate resources would be recovered immediately adjacent to the Phase 1 area and over a 19.2-acre area of the site and over an approximately five-year period. Phase 2b operations would include extraction of material from a 27.7-acre area and is expected to continue for approximately six years. Phase 2c would mine material from the remainder of the above-grade extraction footprint (45.8 acres). Phase 2c is expected to continue for approximately 11 years. Although the existing Vulcan Materials plant abuts the western boundary of the Project site that would generally be mined during Phase 2b, without development occurring to the north or south of Vulcan, views from the west would see mined hillside to the north (Phase 2a) and south (Phase 2c), as well as impacts to elevations higher than the current plant. The lengthy Phase 3 actions occur below grade, and therefore would not be visible from viewers along public roadways to the west.

Slopes would be revegetated and contrasting newly broken rock would be stained as each phase (described above, and in more detail in Section 2.1) is completed. This would soften the overall look of the cut areas as color variation associated with raw soil would be somewhat obscured. It is understood, however, that the more abrupt slopes, combined with the "terracing" of the cut slope, is expected to retain a modified nature and never be wholly obscured by vegetation. The character of the natural foothills will not be restored and will remain noticeable. The issue is whether the visible long-term change resulting from the Project is considered significant.

Overall, although the length of the Project exceeds that of a residential or commercial construction period, and would retain some permanent character as a modified slope where visible, it also varies from such projects in that: (1) it would occur in part on an already disturbed site adjacent to similar activities as part of the existing condition, (2) construction activities would move around the site, creating more focused disturbance areas at any specific point in time with the most highly visible Project elements (slope modification) occurring within a 22-year period and with the longest single operational phase being 11 years, and (3) activities also would be partially screened from potential viewers by robust intervening landscaping from the north, and by adjacent built uses on some other parts of the site.

Viewers from the east (anticipated to be very few due to the relative inaccessibility of the area and identification of the area as preserve) would be located at higher elevations than the Project and looking at extremely expansive views westerly. They would generally be looking over the Project, which would cut away slopes at elevations lower than those viewers, and they would not be viewing the foothills per se. Potential future viewers from the north or south (in open space areas currently posted for no trespass) would be looking in line-of-sight along the foothill/mesa floor junction. The benched cuts into the existing slopes would be noticeable but seen by very few viewers; and those viewers also would not be looking at effects to the foothills straight on. These views also would include industrial elements already existing, such as the Vulcan Materials plant and the Calpine and Pio Pico energy facilities. The views most affected would be from the west, where viewers could look over open (and currently largely undeveloped) mesa toward the foothills. Sensitive viewers with substantial exposure associated with parks, identified vista points, etc. have not been identified in this area. Viewers are generally expected to be associated with industrial businesses, or with through traffic to the prisons/other industrial uses on Alta Road over 0.5 mile distant.



The contrast caused by the Proposed Project during operations would be noticeable from the mesa floor but not visually dominant relative to the overall mountain scape and would not be larger in scale than the surrounding elements. It would introduce new diversity, and slightly interrupt the continuity of overall views. It would not, however, be inconsistent with immediately abutting heavy industrial uses, and would not affect the hilltop and mountain views that draw the eye up and eastward. Although a future condition, it is also noted that during the operational period, development consistent with the EOMSP is likely to result in existing views from Alta Road being at least partially screened by other industrial development located between Alta Road and the foothills.

Visual Character Post Reclamation

Figure 24, Visual Simulation of View Eastward from Otay Mesa Road Terminus at Alta Road), depicts a post-reclamation view from the most open view point to the Project to the Project, seen by the greatest number of viewers. It depicts the Proposed Project's topographic configurations after all phases of the above-grade extraction operation and reclamation have been completed, following rock staining and reseeding efforts associated with Phases 2a through 2c. The Proposed Project would change the profile of some of the foothills whose gentle slopes currently provide a visual transition between the hills and the mesa; however, the long-distance views of the flat mesa areas would not be interrupted by the Proposed Project landform configurations. Although equipment and some lower Project elements could be visible for some time thereafter from particular view locations, they cannot be accurately simulated due to their active and mobile nature. The simulation addresses the most visible and permanent Project element, modifications to natural slope above grade.

As described, reclamation would commence upon completion of each phase, with final reclamation including final grading of final land forms, removal of built plant equipment, application of topsoil resources, and revegetation of pads. Mobile equipment also would be removed. Some transverse roads may remain, but no structures would remain on the site. The proposed pad areas, where at similar elevations as the existing mesa in the southern portion of the site, would extend the existing mesa farther to the east where the bottom of the hill has been cut. Complete and final reclamation actions on the mesa pad would be the very last actions on site and would follow completion of Phase 3 grading; focusing on filling of the Phase 3 mining pits, bringing this area back to grade, and vegetating this ground level feature.

The most notable permanent change to the Project would be the manufactured slopes resulting from the mining activities, as shown on Figure 24. The cut areas would extend no further than approximately half way up the existing slope and would not result in modified topographic features forming a new horizon line. Final slopes would be steeper (up to 1:1) than the existing hills on and near the Project site and would have horizontal benches spaced evenly across them. All exposed rock and soil on the hillsides, where visible, would be light colored when first exposed.

Slope revegetation would reduce the visual contrast of the exposed soil with the surrounding area. The steep, rocky slopes with benches would support sparser vegetation (with lighter soil showing through) than the existing vegetation, and the slopes would appear more manufactured in configuration. In accordance with the design measures included in the Reclamation Plan, exposed rock outcroppings would be stained and the proposed vegetation would be planted, which would



provide some softening and screening. Slopes work would occur as each phase ends, so that reclamation activities for Phase 2 would be completed within the 22-year impact cycle and several years following for staining/plant installation. The native plants proposed by the Reclamation Plan would provide visual continuity between the Project site post-reclamation and the surrounding area, softening the strong contrast and ensuring that the manufactured slope elements created by the Project would still contain vegetative references to nearby natural slopes.

These design measures would lessen the dominance of the newly formed slopes such that they would not be visibly incompatible with the existing visual character. The slopes, while still distinguishable (steeper angles than nearby hills), would be compatible due to the similar vegetation and the staining of exposed rock. The diversity post-reclamation, therefore, would not be incompatible with the existing visual environment. Overall, the contrast caused by the Proposed Project would be noticeable but not visually dominant, would not be larger in scale than the surrounding elements, would introduce new diversity, and slightly interrupt the continuity of overall views. The native plants proposed by the Reclamation Plan, however, would provide visual continuity between the Project site post-reclamation and the surrounding area, softening the strong contrast and ensuring that the diversity created by the Project would not be substantially incompatible with the existing visual environment to the east.

Visual Quality During Operations

The existing vividness of the Project impact footprint area currently is comprised of the undulating, flowing lines of the mountains and the expanse of the mesa area, and the contrast existing between them. The Project is located where the lowest hills provide a transition between the flat mesa and the high mountains.

During Project operation and where visible, the anticipated lightly colored equipment, the exposed tan soil without vegetation and darker volcanic rock (where excavation actually reaches volcanic deposits) would be contrasting elements that would interrupt the continuity of the flowing lines between the mesa and the mountains. These elements would draw the viewer's eye and provide a distracting element from the overall visual composition of the area, but would not substantially affect the overall vividness, based on the much larger size of the background foothills and mountains, and their unaffected open space above the grading footprint.

It is noted that the EOMSP identifies the foothills as an area of "special scenic beauty" in Policy UD-1, which can provide a heightened sensitivity to change in visual quality. This discussion addresses overall quality of the visual environment and is particularly applicable to views toward the Project from the west, because open expansive views encompassing the foothills are provided from the west. Please see Guideline 4, below, for additional discussion of plan conformance.

Project-related visual impacts to the foothills have been assessed throughout this analysis. Although the Project footprint directly impacts the foothills, overall effects on visual quality have to be addressed in context. The foothills extend north-south for approximately 10 miles within the U.S. (They extend further south into Mexico, and could be considered part of the visual setting, but are not included here because the border fence, and the variation in development pattern north and south of the border, affect the visual impact of these foothills.) Looking solely at the U.S. portion of the foothills variously visible for viewers set back from the mountains, the Project would



affect approximately one mile in a linear extent, and less than 200 feet vertically, back dropped by the much higher hills and mountains to the east. The relative size of the Project assessed against this larger backdrop is indicated in Figures 22 and 23. The Project is notable but does not substantially affect the perception of an expansive extent of open space east of the valley floor. Also, relative to quality, it is also noted that viewers are generally aware of the industrial uses in the vicinity, as they travel through them, and to some extent look through, by, or over them, to these foothills. These considerations, combined with the low number of sensitive viewers identified, result in effects on visual quality being notable but less than significant relative to contrasting with existing character.

Visual Quality Post Reclamation

When the Project is complete, the equipment would be removed. Some transverse roads may remain, but no structures would remain on the site. The proposed pad areas, where at similar elevations as the existing mesa in the southern portion of the site would continue the mesa further eastward.

Exposed rock formations that would not support vegetation would be stained as part of Project design to resemble aged, exposed rock, thereby reducing the potential contrast and visibility of exposed outcroppings. The vegetation that would be replanted would likely be sparser than the vegetation on the abutting hills because the new slopes would support less topsoil than the existing hills. Although it would somewhat darken views of the slopes, particularly from a distance, the lighter color of the underlying earth would still show through when the vegetation is mature.

For the few viewers looking westerly, the Proposed Project would have cut away some of the slopes visible in westward views, such as from Otay Mountain Truck Trail. These elements would be below the viewer, at some distance from viewers on the trail, and with intervening gullies between them (and therefore not in the foreground). Please refer to Figures 3 and 18 regarding the mid-slope and west-facing nature of cut as well as Project properties that would not be subject to mining. Being below the viewer and at distance, the viewer's focus would be over the Project site to more distant westerly views. The Project would not interrupt the vividness of the view toward the west, which draws the eye with the expansive nature of the dominant background mesa.

Looking easterly, the unity of the area is created by the vegetation that provides visual transitions between the mesa and the mountains, and the repeating, undulating lines of the hills as they rise toward the taller mountains in the east. The contrasting elements that would be introduced by the Proposed Project operations would remove portions of the vegetation within the Project impact footprint, damaging the visual order of the area through the introduction of wide expanses of exposed soil and rock. These changes would be smaller in scale than the dominant elements that comprise the visual composition of that area, and therefore would not degrade the overall unity of the area. The greatest impacts, when only raw soil/newly cut rock is visible, also would be temporary. Site reclamation would soften the contrast created by the exposed soil and would ensure that the Proposed Project slopes would be more compatible with the existing vegetation on the hillsides and pads abutting the Project site. The scale of the Proposed Project, a relatively small area in a much more expansive horizontal and vertical landscape, also would ensure that the overall unity within the larger visual landscape is not significantly degraded. Also, as noted above, although not part of this Project, the overall setting is identified for primarily industrial uses, and



increased development would obscure or additionally minimize, views specifically to the Project area, with the highest peaks to the east likely remaining visible.

The smaller scale of the Proposed Project elements in relation to the mountains and mesa that comprise the vivid overall view would ensure that the Proposed Project post-reclamation would not impact the vividness of the area. Additionally, the Proposed Project elements would not interrupt views of the largest mountains that form the horizon; these would continue to provide the dominant background in eastward views of the area, resulting in the image of notable skylined hilltops and higher ridgelines remaining intact. The visual effects of the Project would be toward the developing portion of the mesa and not substantially affect the visual coherence of either the developing mesa or the more natural open space given its small relative size in the view.

Applicable Design Guidelines

With regard to applicable design guidelines, the EOMSP characterizes East Otay Mesa as the unincorporated County's largest industrial area. Although permanent building massing, setbacks etc. are primarily focused on business parks in this area and not applicable to a mining activity, the Proposed Project would not visually conflict with the desired character of the surrounding area, as outlined in the EOMSP land use, landscaping, and architectural standards. Planned site reclamation would allow future development of the site consistent with the EOMSP, including review, to ensure compatibility with future surrounding development. Thus, the Proposed Project's interim mining/extractive use would be compatible long-term with the undeveloped/industrial character of the area, while planned site reclamation would allow future development of the site that would be compatible with future surrounding development according to the EOMSP. Please also see discussion under Guideline 4, below, relative to EOMSP compliance relative to UD-1.

Overall, therefore, the Project is expected to fit into and not conflict with the character of the surrounding planned uses, and no significant visual consistency impact is identified. The Project would have a less than significant impact with regard to Guideline No. 1.

5.5.2 Guideline 2: Result in the removal or substantial adverse change to valued visual elements

No historic resources, trees or notable rock outcroppings are located on the Project site. Visual value may be assigned to Project slopes and existing vegetation. This is consistent with identification of the foothills as a valued scenic resource in the EOMSP (see also analysis under Guideline 4).

5.5.2.1 Slopes Modification

Operation of the proposed construction aggregate facility and the resulting creation of pads and manufactured slopes would impact slopes within the 110-acre Project impact footprint. The resulting manufactured slopes would be steeper, and more uniform and geometric than the existing hillsides; they also would include evenly spaced benches extending horizontally across the length of the new slopes. Cuts would expose rock and soil with different tones than the weathered topsoil with vegetative overburden, or the existing sparse scrub habitat. Where cuts reach to underlying volcanic deposits, darker rock could be exposed, contrasting with the lighter soil. This



configuration would affect continuity of the area's visual environment. These modified slopes would be visible from points west of the mining area (see View 7, 8, 10 and 11 on Figures 21, 22 and 23). As the Project grading would be restricted to the approximately bottom half of the slope, however, with hilltops being retaining in their natural state and staining/revegetation taking place the resulting manufactured slopes would remain noticeable, but not substantially degrade the quality of views toward the broad foothills and mountains, of which the Project is only a small part. Overall and more prominent views to the slopes of the higher foothills and mountains with larger expanses of steep slopes would not be substantially altered. The Project, therefore, would not cause a significant impact to valued visual character with regard to slope modification.

5.5.2.2 Undisturbed Natural Vegetation

Native vegetation exists within the Project impact footprint and is visually similar to the vegetation surrounding the site. The vegetation contributes to the continuity of the Project impact footprint with both mesa to the west and hills to the east, as well as unity of the visual environment. None of the vegetation within the Project impact footprint is visually unique or vivid and areas have been disturbed by human activity, including installation and operation of the transmission line crossing the site.

As detailed above, Project operations would not occur within the entire mining area at any one time. Areas not yet disturbed by Project operations would continue to support the existing vegetation, and reclamation (with reintroduction of the native palette) would occur as each phase of the Proposed Project is completed, ensuring that the entire site would not be not devoid of vegetation at any one time. The Reclamation Plan plant palettes have been drawn from existing and surrounding vegetation, and mainly low-growing shrubs and annual flowers and grass-like plants such as: buckwheat, monkey flower, redberry, sage, California poppy, and lupine. Larger shrubs such as toyon and laurel sumac are also included, but in lesser quantities that reflect the sparser distribution of such shrubs in the surrounding hills. Pad areas would be seeded with a similar mixture of mostly low-growing shrubs and annuals to control erosion and provide cover. Although replaced vegetation would grow more sparsely on the rocky slopes created by the Project, this vegetation would still provide continuity with the native vegetation to the east in nearby foothills and the mountains. The large open space set aside associated with the Project (a total of approximately 329 acres in the sensitive hills and mountains east of the mining footprint) would ensure that visible native habitat is retained in perpetuity. Given the distance of viewers to the site and to that open space, the lack of uniqueness or vividness of the on-site habitat that would be affected, as well as ongoing revegetation and retention of such a large block of native habitat, visual effects associated with loss of habitat is considered less than substantial, and less than significant for this visual element.

5.5.3 Guideline 3: Substantial obstruction, interruption, or detraction from a valued focal and/or panoramic vista

As noted in the description of the Project setting, no existing parks or other formal public viewpoints are located in proximity to the Proposed Project. Also, this Project would not result in obstruction of any vista as it would not construct anything that would shield views otherwise visible. Visible elements of the Project would be on the lower elevations of the San Ysidro Mountains and foothills when viewed from the west, and below the viewer and generally out of



sight when viewed from the east. The remainder of this discussion addresses potential interruption of, or detraction from, views from recreational areas or public roads; and in particular, views to the foothills, in accordance with the EOMSP.

Views from Harvest Road to the mining area (a third priority route) are generally not considered sustained or clear. The road trends north-south, so viewers would be obtaining peripheral, rather than straight on, views. Also, located at a mile plus distant from the Proposed Project at its closest point, and on the (relatively flat) mesa, viewers would be located west of SR 905 until the crossing of Otay Mesa Road, with intervening development (including that associated with the busy Otay Border Crossing) sited between the viewer and the southeastern portion of the Project site (where the greatest level of vertical modification would take place).

Once north of Otay Mesa Road, where views toward the mountains would be most open, intermittent development would still be between the viewer and the Project site, with the power plant located between the viewer and north end of the mining area. The northern portion of the Project site is also the area where the least incursion into the hill formation would occur, with most activity being at "ground level." Due to the distance, the intervening and distracting uses, and the location of greatest visual effect being in the least visible portion of the site from Harvest Road, no substantial detraction to views from this road are identified.

The reader is also referred to the discussion of impact associated from the Otay Mesa Road and Alta Road intersection, as depicted in Figures 22 and 24. Conservatively assessing these stopsigned intersections to comprise a valued focal point still would not result in substantial detraction from the vista. Activity that would draw the eye, involving active cutting and moving equipment along the hillside above the mesa floor, primarily would occur in focused areas for a 22-year period. This would be obscured by intervening development anticipated under the EOMSP. Also, at any one time, activities would focus on the approximately 1,900-foot-long Phase 2a, the approximately 1,400-foot-long Phase 2b, or the approximately 1,600-foot-long Phase 2c. Mounds and vehicular activity associated with active mining operations potentially would draw the viewers' attention, but given the other industrial activity in the area, as well as general distance from the site, would not result in substantial detraction. The mesa closest to the viewer would not be affected by the Project, and the modified slopes behind the Project would be visually outweighed by the higher hills associated with the mountains to the east. Structures and silos associated with the Project would be visible to viewers from this location to the southwest but would be restricted to the northernmost portion of the Project and would meld into the larger and taller structures associated with the power plant. This portion of the mesa is not currently natural in appearance due to the power plant, and the power plant would continue to dominate the built environment. Substantial detraction from the existing view would not occur. Ultimately, as shown on Figure 2.1-1 in the EOMSP, the entire intervening area would be built out with mixed industrial uses and State Route 11, which would block views to these lower foothills (see additional discussion in Section 5.6, Cumulative Visual Impacts, below).

The Otay Mesa Truck Trail is used by mountain bikers and off-road vehicle motorists, as well as border patrol agents. Westward panoramic views of Otay Mesa are available from portions of the Otay Mountain Truck Trail east of the Project mining area. Although numerous areas along the trail contain intervening topography or vegetation shielding views toward the site, other locations



provide open visibility to the site and mesa to the west. Particularly if users of the trail stop along the way, expansive views of some duration can be obtained.

Viewers from the Trail would be looking down slope and over native vegetation toward the site and the mesa. The Proposed Project would introduce noticeable elements in the middle ground (active mining equipment or structures, graded or pit areas, and/or conical piles of stored aggregate) which would not be obscured from a few sections of this trail. As noted, however, the Proposed Project would be lower in elevation than the viewer, and the pad and slope areas created by the Project would not constitute major elements. To some extent, the modified foothills (where the greatest amount of slopes modification would occur) would be vertical and below the viewer from the east. Their view also is oriented westerly, toward the open and expansive mesa. Potential detraction or interruption of these views is not identified as substantial for the following reasons. The portion of the site seen from the viewpoint is generally the northernmost 16 acres, which would include structures/office/parking and disturbed earth areas, similar to those already in the view. Views directly down into the site from the Trail are not possible because the Trail does not trend close enough to the impact footprint. Either the viewer would be focused on the more expansive western view and generally looking over the visible disturbed portion of the site, or the viewer would look down toward the site, but the view would already be substantially impacted by the prominent power plant and nearby development and the additional mining activity would not independently substantially affect this view. No substantial interruption or detraction is identified.

Otay Mountain Wilderness Area is located within approximately one mile to the east of the Project site. The Wilderness area encompasses remote peaks with no access roads or trails, and therefore is not included as a location that might support potential viewers. If public viewpoints existed, views of the Project site would not be available due to topography and distance. Therefore, no substantial detraction from an identified vista would occur in the Wilderness Area.

As noted in Section 4.2.1, *Viewer Groups and Sensitivity, Exposure and Awareness*, above, future facilities associated with access to Otay Regional Park through Johnson Canyon or an equestrian trail along a portion of Calzada de la Fuente west of the Proposed Project would be expected to focus on views to the north and further east, or to encompass larger and intervening industrial development.

The mining into the lower part of the foothills could detract from the panoramic views to which they contribute. As described above, however, the encroachment would occur on a small portion of the linear (horizonal and vertical) extent of the foothills and their backing mountains and following the phased reclamation would contain elements of the nearby natural slopes. Absent intervening mesa development, the Project-related slopes modifications would remain visible, but constitute a relatively small portion of the view overall based on the extensive panoramic views associated with the range. There is also a general lack of identified sensitive viewers, and the mesa in the Project vicinity is largely planned for current and future industrial uses overall. Ultimately, parts of the slopes modification would not be visible, and the value of the Otay Mountains views as a backdrop to the industrial and developed mesa uses, would continue. The potential Project-related adverse effects would not constitute substantial changes to the overall view.

No significant impact is identified based on substantial impacts to valued focal points or scenic vistas.



5.5.4 Guideline 4: Compliance with applicable goals, policies or requirements

5.5.4.1 County of San Diego General Plan – Conservation and Open Space Element

The Project proposes applicable design measures to ensure that lighting, site, landscape and grading plans and their implementation comply with the County's General Plan COS Element (see below). Compliance with the COS Element Policies applicable to the Proposed Project are detailed in Table 4.9-1 of the EIR. Specific information pertaining to scenic resources and potential impacts to slopes, are located under Guidelines 1 through 3, with the most substantial discussion under Guidelines 1 and 2. Potential lighting impacts are discussed under the heading Dark Sky Ordinance, below.

5.5.4.2 East Otay Mesa Specific Plan

The EOMSP Policy UD-1 encourages the preservation of the visually prominent San Ysidro Mountain foothills, within which the Project site is located. Visual impacts resulting from the Proposed Project would impact a low and relatively focused portion of the foothills and would not disrupt the overall visual environment of the mountains, as explained above and as depicted in Figures 22, 23, and 24. Additionally, the existing on-site slopes that would be impacted are not visually distinct (i.e., do not visually differentiate or "stand out") from adjacent slope areas, as further addressed below. While the ultimate configuration of land within the Project impact footprint would include steeper and more sparsely vegetated slopes, the Project's proposed Reclamation Plan includes a Revegetation Plan that would provide some visual continuity both with the natural hillsides and the flatter mesa areas surrounding the Project.

The "Implementation" text immediately following the policy notes that UD-1 is "primarily applicable to portions of Johnson and O'Neal Canyons" (County 2015:54). The Proposed Project does not include any development or impacts within O'Neal or Johnson Canyons, designated as Conservation/Limited Use Areas and identified as areas of special scenic beauty in the EOMSP. Johnson Canyon is located west of O'Neal, west of the north-south portion of Alta Road and north of Otay Mesa Road and Paseo de la Fuente. Canyon recreationalists would not have views to the Project site (refer to the Viewshed Map, Figure 11). O'Neal Canyon is located north of the Project, cutting between Donovan State Prison and the George F. Bailey Detention Center before entering the mountains north of the east-west trending portion of Alta Road. The northernmost portion of the Project has a current elevation of approximately 700 feet amsl and an intervening hill between the Project impact footprint and the canyon is a minimum of approximately 900 feet amsl (climbing ever higher to the east). The canyon drops down in elevation, toward the drainage, by several hundred feet. Recreationalists in the canyon would not have views to the Project. Trails on the north side of the canyon, also appear to be at slightly less elevation than the intervening hill. Any views would be relatively short in duration, and generally would look over other existing industrial uses between Alta Road and Calzada de la Fuente.

This then leaves the less than "primary" concern over preservation and enhancement of visually prominent land forms and areas of special scenic beauty, especially as seen from Circulation Element (CE) roads and Open Space Element trails. Each of these elements is addressed in order.



Merriam-Webster defines "prominent" as:

"standing out or projecting beyond a surface or line (as in the sense of "protuberant"), readily noticeable (as in the sense of "conspicuous"), or "widely or popularly known."

As stated throughout this analysis, it is acknowledged that the cut into the hill would be visible, and noticeable. It is not the impact that is addressed in UD-1, however, but the resource. As can be seen on Figure 16 View 10, which presents the existing view without any highlighting of the Project area, the portion of slope that would be affected does not stand out from the rest of the hills. It is a lower section and is visually "outweighed" by the top of the hill above it, which *does* stand out from the higher mountains above and east of it. This portion of the foothills is not conspicuous. For a viewer looking due east from the west, it is close to the mesa line in an area where the eye is drawn up toward the tops of the hills and mountains and toward the distant horizon line. Additionally, this location abutting the mesa, results in it being hidden from sight from some locales by other development to the west or north of it. It is also not of "special scenic beauty." It is *consistent* with the foothills overall and does not stand out as an "especially" scenic portion of the hills.

With regard to visibility from CE roads, there are two in the vicinity with good views to this location. One is Alta Road, from which the Project footprint is depicted in Figure 22. This is the most open and straightforward view toward the Project and is similar to one in which a driver turning north onto Alta Road from Otay Mesa Road could be looking directly toward the Project. Other views from this CE road could be similar but would not be as direct as they would be peripheral views seen by travelers moving north-south along Alta Road rather than those traveling east. The existing condition is also the worst-case condition for potential view effects. Although the precise nature and timing of other mesa development is not certain, it is noted that the expectation is that the mesa between Alta Road and the Project will be developed consistent with the EOMSP. The closer developed uses would obscure the Project from that roadway. Travelers in this area also are considered to generally be traveling between existing business/industrial uses (e.g., truck and container storage lots that currently line Otay Mesa Road and Alta Road in this area), the nearby power plants, and/or the prison facilities. As stated above, and as opposed to recreational viewers, business-oriented viewers are not assigned high levels of sensitivity to visual change – their focus is considered to be on their destination rather than their setting. For all the reasons described above ("primary concern" relating to canyons which would not have visual impacts, lack of visual prominence, and lack of viewer sensitivity), the impacts to views toward the Project from CE Alta Road are not identified as inconsistent with UD-1.

The second CE road with views to the Project is Lonestar Road. This road would be located on top of current Paseo de la Fuente in proximity to the Project, and future portions of the road that do not currently exist as it will trend southerly to intersect with Siempre Viva Road. Two figures are relevant to Project visibility from these future sections of Lonestar Road: Figure 21 View 7 and Figure 23 View 11. As depicted in Figure 21, the young vegetation along Paseo de la Fuente provides some level of shielding to the Project footprint area. This condition is expected to continue, with vegetation becoming more dense as it becomes more mature. Existing power plant elements are already evident in these nearby views, and other developed uses in accordance with the EOMSP are expected to be placed in this area as it builds out. The more open views from future



Lonestar Road would be located to the south. These views are generally represented by Figure 23, from the eastern terminus of Airway Road. Currently, paved road trends south from the location in the figure, but ultimately, Siempre Viva Road will extend east and north to meet an extension of current Paseo de la Fuente when it becomes the Lonestar Road extension at a location approximately due east of the Airway Road terminus. At that point, the cut would be close to the viewer, and although some of the more northern area (near Vulcan Materials) would be future mixed industrial development, a future large-lot lot residential use could be located in the area. Residential viewers generally are considered highly sensitive to changes in their existing environmental setting. There area, however, no homes currently in the area. Assuming a home could be located in this area prior to Project initiation within the landfill buffer zone, the size of the lot would allow for choice in orientation of the home, for the small associated number of viewers. Although all of these are future conditions, it is noted that the visual environment also would not be otherwise pristine. As stated, Lonestar Road/Siempre Viva, both CE Major roads would be in proximity to these viewers. The anticipated extension of SR 11, a major route carrying substantial truck traffic and completed to access a planned U.S. Port of Entry, would be located just to the west of those roadways. Mixed industrial planned uses abut the rural residential designations, and the buffer surrounding a potential landfill located in the hills east and south of the Project also overlays the planned residential and mixed industrial uses in this area. All of these considerations result in the Project being assessed as consistent with UD-1, as noted above.

Finally, and relative to the designated trails, the closest trail is the one shone on the EOMSP trending north from Calzada de la Fuente toward the Otay River Valley. A portion of this trail (closest to the Project) has been completed by the Detention Center. It trends along the eastern boundary of the Center adjacent to the parking lot. Trail users moving northerly would have their backs to the Project area. For users moving southerly, views are expected to be to the immediately adjacent open space – due east -- rather than toward the Calpine facility, located immediately south of the trail. Regardless, those viewers are moving toward a very industrialized portion of the mesa, and accessing Calzada de la Fuente would be considered the goal, rather than recreation. This is not considered inconsistent with UD-1.

No significant adverse effects is assessed to views to or from these areas of special scenic beauty.

EOMSP Policy UD-6 states that on-site landscaping should be compatible and complementary with streetscape design along the public right-of-way. The Project proposes tree and shrub screening of the portion of the Project abutting Calzada de la Fuente. Plants are compatible with streetscape plants identified in the EOMSP for streetscape, and also with natives located in the area.

5.5.4.3 Resource Conservation Area

Otay Mountain is located within the Otay Mountain–Lower Otay Lake RCA, described in the Otay Subregional Plan of the County General Plan (2011). While significant plant and habitat resources are located throughout the RCA, the mountain is also described as being a scenic landmark. While the RCA boundary is a minimum of approximately 850 feet distant from the closest part of the Project footprint (the boundary is located within Project Biological Open Space), the mountain is located approximately 3.5 miles northeast of the Project impact footprint. The Project impact footprint is not visible from Otay Mountain due to distance and topography, nor would the



Proposed Project change Otay Mountain or block views toward it from any public or private viewpoints; therefore, no scenic or visual impact to the RCA would occur due to the Proposed Project operation or reclamation. Any potential Project biological impacts to the RCA would be addressed under the MSCP; therefore, no biological resources impact to the RCA would occur due to the Proposed Project operation or reclamation.

5.5.4.4 Dark Sky Ordinance

The Proposed Project would include lighting, but as stated in the Project Description, mining operations would not occur after 10:00 PM unless required for needed for public health, safety and welfare concerns. Project-related lighting would be required to adhere to Division 9 of the San Diego County LPC. One entry light would be located at the site perimeter, adjacent to the street providing access to the Project (within a light industrial/commercial district). Other lights, as shown on Figure 5 of this report, would be located interior to the site, with lights focused on areas of activity, and not onto off-site locales. Lights would primarily be attached to stationary plant equipment. Security lights at the site office building and/or parking lot lighting may remain on during later hours to facilitate maintenance activities of material export. Lights would be 15 to 20 feet tall and would be similar in illumination to street lights. They would be directed downward and/or fully shielded, consistent with County requirements. In addition, each piece of equipment may be lit, and the equipment may move during Project operation. When required, lighting within the Project impact footprint adjacent to preserved habitat would be of the lowest illumination allowed for human safety, selectively placed, and shielded. All Project lighting would be directed toward interior Project use areas and no light would spill beyond the boundary of the Project impact footprint. Overall, the lighting would meet the objectives of the Dark Sky Ordinance and Zone designation. No significant impact would occur.

5.6 <u>Cumulative Visual Impacts</u>

This section provides information regarding past, present, and reasonably anticipated future projects that could potentially combine with the Proposed Project to result in cumulatively considerable impacts (State CEQA Guidelines Section 15130). There are approximately 50 planned development projects that have been identified in Otay Mesa. Each of the projects are described in Table 1 and shown in Figure 25, *Cumulative Projects*.

As shown in Table 1, cumulative projects include a variety of project types in addition to the planned construction aggregate and IDEFO: light industrial and commercial development, temporary vehicle storage, a recycling facility, tractor/trailer and container storage, retail/commercial uses, a detention facility, expansion of an existing correctional facility, photovoltaic and aviation uses, water storage reservoirs, capital improvement and freeway projects, grading for proposed roads, regional and neighborhood parks, single- and multi-family residences, a church and education center, and the subdivision of large lots, including grading and utility improvements in anticipation of future light industrial/commercial development. Over half of the projects are within 2 miles of the Project site and potentially located within the Project viewshed. Projects within the Project viewshed (including the Proposed Project) would contribute to regionally cumulative visual effects and are evaluated in this discussion. Not all projects within the viewshed would be visible at any one time or from one point; they are not concentrated in one



portion of the viewshed, and local topography, vegetation, intervening structures and land uses often block views of the projects.

Implementation of these anticipated projects, in addition to the Proposed Project, would alter the cumulative visual environment of the area from primarily undeveloped grasslands with a few large-scale developments to a more densely developed urban area of primarily industrial and commercial uses. The current views of wide expanses of open space would be lost. This change has been addressed in environmental documents for the EOMSP, as discussed further below.

Some of these projects include only subdivisions and grading, such as the Otay Crossings Commerce Park (3), Burke Minor Subdivision/Otay Logistics Center (5), and Otay Business Park (7). Generally, these projects would include surface improvements.

Although not planned projects, the closest and currently most visible developments to the Project site are the existing Calpine power plant and Vulcan Materials plant. These facilities are integral parts of any view analysis and are briefly summarized here. The power plant includes large structures such as condensers, stacks, water storage tanks, and buildings between approximately 26 feet and 130 feet high on approximately 15 acres of a 46-acre lot. The vertical scale of these structures is visually significant. The Otay Mesa Generating Project has painted site elements with neutral earth tone tan and gray colors, and uses non-reflective fences and landscaping. These measures, while not reducing the scale of the project, serve to reduce the dominance of the equipment from some angles by allowing it to more easily blend with the surrounding landforms and natural vegetation. The Vulcan Materials facility is located west-southwest of the Project impact footprint and consists of concrete and asphalt batching facilities and associated equipment, storage structures, and conical piles of aggregate materials separated by 20-foot-high divider walls. A 300-MW peaker plant (Pio Pico) at the intersection of Calzada de Fuente and Alta Road. immediately west of the Otay Mesa Generating Project, came on line at the end of 2016. The plant contains substantial structure massing and tower heights. Three approximately 100-foot tall generator stacks, as well as three vertical air outlets, turbine generator inlet air housings, selective catalytic reduction facilities, and a wastewater storage tank are on site. Ninety-foot tall transmission lines and switching facilities are associated with the plant, immediately adjacent to Alta Road. Landscape perimeter planting and streetscape plantings are planned, with a dense screen of trees and shrubs along the Alta Road frontage.

The Otay Crossings Commerce Park (3) would be located at the southeast corner of Otay Mesa Road and Alta Road, the location of the photosimulation picture. The Otay Crossings Commerce Park site extends southward to the international border. That project proposes to subdivide a large area into pads, and to prepare those pads for future development of light industrial buildings. The project also would include associated amenities, such as parking lots, landscaping, roads, etc. Some lots within the Otay Crossing Project would be set aside as a right-of-way for the future development of SR 11.

The Corrections Corporation of America Project (8) is located east of Alta Road, across from the power plant. That project proposes a 2,132-bed secure detention facility and associated ancillary support services. Most buildings within the complex would be one or two stories tall, with the tallest building at 38 feet, and the tallest architectural element at 45 feet. The Project would include a three-level above-ground parking structure and chain link fencing. Most of the proposed



elements would be located on graded pads below the level of the surrounding roadways. As part of the Project, Lonestar Road is proposed to be extended eastward from its current terminus at Harvest Road to trend generally eastward along the southern edge of the proposed correctional facility project to meet Alta Road. The project includes landscaping along the street to screen views of the buildings and project features; including evergreen trees along Lonestar Road, creating linear green elements that would contrast with the otherwise brown mesa across which they would trend.

Automobile operations include the National Enterprises Storage and Recycling Facility (6), which would create auction yards and recycling facilities similar to the existing auto auction yard south of Otay Mesa Road along Alta Road at the access road to Donovan Correctional Facility, south of Kuebler Ranch Road. These sites generally would be more visually diverse, including a large number of vehicles and equipment, but would generally be smaller in scale and have fewer structures than the Proposed Project.

Most of the cumulative projects would include landscaping, either within parking lots, along the perimeter of a lot, and/or as streetscaping, similar to most of the landscaping existing within the already built-up areas of Otay Mesa, and in conformance with the EOMSP that includes both trees and shrubs. Clear examples of such planting are shown along the north side of Calzada de la Fuente in View 5, and along Paseo de la Fuente or Access Road in Views 7 and 8. The proposed landscaping would add more vegetation within the viewshed, but the vegetation would be similar to the trees currently visible in developed portions of the mesa. Generally, the landscaping would not block views of the mountains in the background. The Pio Pico Energy Center includes largescale structures, similar to the existing Calpine Power Project, and Vulcan Materials Plant. The Otay Crossings Project would create flat pad areas visually similar to the mostly flat topography currently visible in the simulation photograph (Figure 24). The Proposed Project would extend the flat topography of the surrounding area eastward. Based on the generally flat nature of the mesa overall (see Views 2, 10, and 11 for views showing the mesa, as well as Figure 25 which includes reference to underlying topography) development associated with the cumulative projects list is not expected to result in substantial alteration of landforms – modifications from existing elevations would be relatively minimal and incursions into more rugged terrain would be relatively limited. As development nears the base of the foothills (see Views 3, 4, 7 and 8) the Project and other cumulative projects would create flatter pads on slightly more varied terrain, and, in the case of the Project, also cut into lower slopes in the foothills while extending mesa floor to the east. None of the mesa is identified an area of special scenic beauty, and the "visually prominent" landform associated with it is generally flat. Nearer the foothills and mountains, the Project would excavate into the lower foothills. This does not combine with any other cumulative project as it is the only project excavating into the western foothills. It is also noted that neither Johnson Canyon nor O'Neal Canyon (the two areas identified in EOMSP Policy UD-1 as being primarily applicable) would be impacted. Given the scale (both horizontal and vertical) of the foothills and mountains east of the mesa, grading would occur within a relatively small portion of the foothills (see Figure 24, which depicts only part of the view easterly as seen by the human eye (a cone of vision), in accordance with County guidelines for simulations). It is notable that the Project would not modify ridgelines/hilltops or views to the mountains beyond. As such, neither the Proposed Project nor any of the cumulative projects in the immediate vicinity would substantially alter landforms or visual quality in a way that would be inconsistent with the pattern of development that has been established in the eastern Otay Mesa area.



The aesthetics analysis in the final EIR for the EOMSP completed in 1994 (updated through 2015) did not identify significant cumulative visual effects related to the overall build out of the mesa in accordance with the Specific Plan. As demonstrated in the project specific analysis, excepting the hillside excavation associated with the Proposed Project, the cumulative development planned for the Specific Plan Area and considered here is no different in kind than that considered in the final EIR for the EOMSP.

Currently, large areas within the eastern portions of the mesa still appear to consist of open space, with a few large-scale developed uses. The continuity provided by miles of visually uniform open fields covered by non-irrigated native and non-native vegetation with few vertical features is being replaced by (alternatively continuous) one- to two-story structures of uniform construction surrounded by irrigated vegetation. The changes in increased scale and mass, as well as the change in the transition (flow) between elements observed associated with implementation of the identified cumulative projects, would result in a substantial cumulative change to the visual environment of eastern Otay Mesa.

These uses are located within industrial or commercial zones, however, in an area planned to have minimal impacts on sensitive viewing groups (residential neighborhoods, parks, schools, etc.). The change is not adverse in effect and is, therefore, not significant under CEQA and County guidelines. The anticipated development of buildings that are relatively low in height surrounded by landscaping and roadways edged with street trees and shrubs would provide a different, but equally viable, continuity. Conservation/Limited Use Areas so designated by the area's specific plans, such as Johnson and O'Neal Canyons, would be preserved, as would the RCA-identified Otay Mountain. Even with the Proposed Project and abutting power plants alterations, the San Ysidro Mountains and foothills would remain dominant visual features that would not entirely be blocked by the proposed developments and would continue to contribute to visual diversity when the mesa is viewed overall.

Although open space would be provided in projects such as the International Industrial Park (1), EOMBP Otay 250 (4), California Crossings (12), Otay Ranch Village 13 (15), Southview East (34) and Candlelight Villas (44), if all anticipated development in the area is constructed, the visual character and quality of eastern Otay Mesa would undergo a high level of change and the resulting visual environment would be more urban as well as more industrial. Consistent with the EOMSP, immediately adjacent additional industrial uses (by others), are planned for lots south of the power plant and east of Alta Road, and would screen Project activities. Development of the Proposed Project would visually contribute to the change. Additionally, all the new development would bring more viewers to the area, exposing them to the high level of change to the visual environment of eastern Otay Mesa. In large part, however, these viewers would be new to the area – coming in response to the new built businesses, and also would be coming for employment. As described above, such viewers are not considered as sensitive as recreational or residential viewers who are already in place prior to development.

The Proposed Project would contribute to existing diversity, and slightly interrupt the continuity of overall views from limited viewpoints. Mining is a heavy industrial use and that would be consistent with surrounding heavy industrial uses, providing visual continuity between the Project site and the surrounding area during operations and post-reclamation. Although long-term in nature, as the mesa continues to build out, the Project would be increasingly obscured by



intervening light and heavy industrial, commercial and detention facility structures. This continuing development on the mesa would tend to obscure portions of the Project identified as visible in analysis of the Project against existing conditions. This would be due to: (1) by structural or landscaping shielding along roadways further to the west that would block views from to the east altogether; and (2) where viewers are closer to the eastern mesa edge, direct shielding of mined areas by other industrial uses located immediately west of the modified slopes and east of the closest street. Taking all these considerations into account, the Project would result in a less than considerable contribution to a less than significant cumulative visual impact.



Table 1-1 CUMULATIVE PROJECTS

Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts		
	County of San Diego Planning & Development Services (PDS)								
1	TM 5549	International Industrial Park	Alta Road at Lone Star Road	170.59	Subdivide vacant land into 24 parcels for technology/business. 118.43 acres to be developed; 35.90 acres placed in open space; 16.26 acres used for internal circulation streets. Development would include 3 acres for the future permanent fire and sheriff station.	Pending	Potential impacts to biological resources, air quality, climate change, cultural resources, geology, mineral resources, and visual resources		
2	TM 5304R/S08- 018	Airway Business Center/FedEx	Northeast corner of Airway Road and Paseo De Las Americas	35.69	Subdivision into 12 lots (minimum 2 acres each) for light industrial uses.	EIR Addendum	Biological survey identified impacts to 38.52 acres of non-native grassland, to be mitigated by purchase of 19.26 acres of mitigation bank habitat. Sensitive species included foraging raptors only. Produces 4,200 ADT.		



Table 1-1 (cont.) CUMULATIVE PROJECTS

Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts		
County of San Diego Planning & Development Services (PDS) (cont.)									
3	TM 5405 SPA 04-006 MUP 00-024	Otay Crossings Commerce Park	Southeast of the intersection of Otay Mesa Road and Alta Road	311.5	Subdivision consists of 42 mixed industrial lots, three open space lots, and two lots for temporary uses pending acquisition and construction of SR 11 and the future port-of-entry.	Supplemental EIR	Potential impacts to aesthetics/visual quality, air quality, biological resources, cultural resources, geology/soils, hydrology/drainage/water quality, noise, public services and utilities, and traffic.		
4	SPA 15 001 GPA 15 008 TM 5607 REZ 15 007 ER 15 98 190 13G	Otay-250 East Otay Mesa Business Park Specific Plan Amendment	Northeastern corner of Otay Mesa Road and Harvest Road/ SR 125	253.13	Specific Plan Amendment to the East Otay Business Park Specific Plan to establish a new Mixed-Use Village Core area within the Specific Plan Area. Maximum of 3,158 dwelling units, 84,942 square feet (sf) of employment uses, and approximately 51.3 acres of permanent biological open space.	Supplemental EIR	Potentially significant impacts include air quality, biological resources, cultural and paleontological resources, hazards and hazardous materials, noise, and transportation and traffic.		



Table 1-1 (cont.) CUMULATIVE PROJECTS

Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts			
	County of San Diego Planning & Development Services (PDS) (cont.)									
5	TPM 20701RPL1 ZAP 99-029 STP 05-018 SPA 05-005	Burke Minor Subdivision/Otay Logistics Center	Eastern side of Enrico Fermi Drive between Siempre Viva Road and Airway Road	39.31/ 14.91	Subdivision into 4 parcels of 8.80, 9.37, 9.48 and 11.66 acres. Grading and improvement of a commercial road traversing the site. Truck parking and storage on site. Construction of approximately 270,000 sf of buildings and warehouse in the northern part of the site, along with 404 parking spaces and 73 loading spaces.	MND	Potential impacts related to biological resources, with proposed mitigation of the purchase of 20 off-site acres of non-native grassland. Potential impacts related to traffic include 635 ADT in Phase I and 715 ADT in Phase II, with proposed mitigation of fair share traffic contributions. Additional potential impacts related to land use and cultural resources. Mitigation measures would reduce impacts to a level of below significance.			
6	MUP 98-001; SP93-004; GPA 94-02; P98-001W1	National Enterprises Storage and Recycling Facility	East and west sides of Alta Road, north of Calzada de la Fuente	161.2	Develop areas for interim use including automobile storage, scrap and recycling operations, and wood and green material recycling, and would include temporary office trailers of 720 sf each and 200 employee parking spaces. Project would provide space for approximately 11,000 vehicles.	EIR Addendum	Impacts to 0.76 acre coastal sage scrub and 103.61 acres of non-native grassland. Mitigation included 67.94 acres of coastal sage scrub and 24.29 acres of non-native grassland for a total of 117.66 impacted areas and 91.28 acres of mitigation (mitigation was of higher habitat value than impacts, resulting in less mitigation area). Buildout conditions would result in 2,403 ADT.			



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts						
	County of San Diego Planning & Development Services (PDS) (cont.)												
7	TM 5505	Otay Business Park (Paragon)	Southeast of future intersection of Alta Road and Airway Road	161.6	Subdivision into 61 industrial lots, from west to east. No specific uses identified. Water, sewer and storm drain lines would be extended into the project site. Off-site improvements include extensions of Alta Road, Airway Road and Siempre Viva Road. The future alignment of SR 11 may traverse a portion of the site.	Supplemental EIR	Buildout conditions would result in 33,486 ADT and project would impact 176.1 acres of grassland, as well as burrowing owl, fairy shrimp, and Quino checkerspot butterfly. Project also would impact air quality, cultural and paleontological resources, hydrology and air quality, and noise.						
8a	P06-074 (MUP 06-074) SPA 05-005	Corrections Corporation of America	Northwest corner of Lone Star Road and Alta Road	40	Construction of a 32-acre detention facility in two phases. Includes associated administrative, housing, parking, program space and ancillary support services with a total of 2,880 beds at buildout and an extension of Lone Star Road along project frontage.	Supplemental EIR	Potential impacts to biology (36.7 acres of non-native grassland and 3.7 acres of disturbed habitat), visual resources, hazards and hazardous materials, hydrology and water quality, public utilities and services, and transportation. Determined no additional impact to agricultural resources, air quality, cultural resources, geology and soils, land use and planning, mineral resources, noise, population and housing, and recreation.						



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts						
	County of San Diego Planning & Development Services (PDS) (cont.)												
8b	MUP06- 074W1	Corrections Corporation of America	665 Alta Road	79	Original permit (MUP 06-074) was approved by the Planning Commission on April 10, 2009. The main purpose of the Major Use Permit Modification is to move the location of the facility approximately 400 feet away from the previously approved site. Other changes include the relocation of the parking lot, an increase in capacity by 20 beds, minor changes to the layout of the buildings, and additional design features to accommodate the new location. Modification Approved by County Planning Commission on July 20, 2012.	CEQA 15162	No new impacts from the previously certified EIR dated July 27, 1994 and subsequent Addendum dated September 20, 2010 were identified.						
9	TM 5527	Piper Otay Park	West of SR 125, north of Otay Mesa Road/ SR 905 and east	24.84	Subdivision into 13 industrial lots ranging in size from 1.03 to 2.61 acres.	EIR Addendum	Environmental Review Update Checklist Form identified potential new impacts to biological						
			of Piper Rancho Road		acies.		resources, hazards, hydrology, and traffic.						



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	County of San Diego Planning & Development Services (PDS) (cont.)											
10	PROPOSED PROJECT - MUP 04-004 RP 04-001	Otay Hills Construction Aggregate and IDEFO (Proposed Project)	Approximately 0.5 mile east of the intersection of Otay Mesa Road and Alta Road	431	Construction aggregate extraction operation, including materials processing (primary and secondary plants), concrete batch plant, cement-treated base plant, asphalt batch plant, and recycling of asphalt and concrete products.	EIR						
11	STP 14-004	Via De La Amistad Truck Parking (Rapid Transfer Express)	South side of Via de la Amistad, between the CHP Commercial Vehicle Enforcement Facility and the U.SMexico border.	14	Proposed lot for storage of tractor-trailers and containers. No proposed structures or project phasing.	IS/MND	Project impacts include the following: 15.9 acres of non-native grassland habitat including potentially significant impacts to eagle and raptor foraging habitat and short term-noise impacts to ground-nesting raptors during the breeding season; potential impacts to one MSCP narrow endemic animal species – burrowing owl; storm water pollutants including sediments, heavy metals, organic compounds, trash & debris, and oil & grease; The project will pay TIF fees for cumulative traffic impacts.					



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	County of San Diego Planning & Development Services (PDS) (cont.)											
12	TPM 21046 MUP06-102 93-19-006AA	California Crossings	On the 9200 block of Otay Mesa Road, east of SR 125 and west of Heritage Road	26.94	325,502-sf retail commercial center.	Supplemental EIR	Potentially significant impacts to air quality; traffic/circulation; biological resources (direct loss of 23.4 acres of sensitive non-native grassland habitat, loss to raptor foraging and nesting habitat, impacts to migratory birds); and cultural and paleontological resources. Impacts determined not to be significant are associated with geology/soils, hazards/hazardous materials, hydrology/water quality, noise, aesthetics, agriculture, land use and planning, mineral resources, population and housing, public services and utilities, and recreation. Mitigation includes acquisition of a 15.4-acre conservation easement and distance restriction of construction during raptor nesting season.					



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	County of San Diego Planning & Development Services (PDS) (cont.)											
13	TM 5568	Rabago Business Technology Park	North of Otay Mesa Road and south of Lone Star Road between Vann Center and Enrico Fermi Drive	71.1	Technology business park with 19 lots. All adjacent roads to be improved to half width.	EIR Addendum	Environmental Review Update Checklist Form identified potential new impacts to air quality, biological resources, cultural resources, geology and soils, GHG, hazards and hazardous materials, noise, public services, transportation and traffic, and utilities and service systems.					
14	TM 5566 MPA 3992- 10-006	Hawano Industrial Development	East of Airway Place, west of Alta Road, south of Airway Road, and north of Via de La Amistad	79.6	Subdivision of 23 industrial lots on 65.62 acres and one detention basin lot on 2.47 acres. The TM would allow for the construction of up to 852,426 sf of industrial land uses.	EIR	The site is currently vacant and vegetated in non-native grassland. Potential impacts to biological resources and traffic/circulation.					
15	GPA 04-003; SP 04-002; REZ 04-009; TM 5316A and B	Otay Ranch Village 13	North of Otay Lakes Road and Lower Otay Reservoir, east of Wueste Road	1,869	Development of 1,938 residences, including 1,881 single-family lots, a mixed-use area with 57 multi-family residences, a 17.4-acre resort hotel with 200 guest rooms, 1,089 acres of preserved open space, and approximately 144 acres of other open space.	Draft Supplemental EIR	Potential impacts to aesthetics and visual resources, transportation and traffic, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, and noise.					



Table 1-1 (cont.) CUMULATIVE PROJECTS Identifying CEQA/NEPA Map Kev **Project Project Name** Location **Proposed Improvements Potential Impacts** Acres **Document** Number County of San Diego Planning & Development Services (PDS) (cont.) Impacts to 0.275 acre of 16 Project No. Metropolitan Within Brown 331 Approximately 810,000 sf **EIR** 208889 Airpark – Brown Field Municipal of aviation uses: an 8 to vernal pool habitat and Field Airport 10 megawatt solar associated San Diego fairy shrimp and San Diego button Redevelopment photovoltaic energy celery on site. Additionally, generation facility; an industrial park with a direct impacts related to land use, transportation/circulation, maximum of 1.4 million square feet of visual effects and development; relocation neighborhood character, air quality, biological resources, of the San Diego Air and Space Museum from historical resources, human Balboa Park health and public safety, and (approximately 480,000 paleontological resources. With the exception of impacts sf); and a commercial center that would include related to land use, visual a hotel, alternative fuel effects and neighborhood character, and air quality, station, bus transit station. mitigation measures are and approximately 201,700 sf of commercial proposed that would reduce impacts to below significance. **Otay Water District Capital Improvement Projects** 17 P2083, PS 870-2 Potable Alta Road, N/A New pump station to MND Potential impacts related to SCH No. Water Pump northeast of the replace existing 571-1 and biological resources, cultural 870-1 pump stations resources, and geology and 2016091019 Station Donovan Correctional soils. Mitigation measures Replacement were proposed that would **Facility** reduce impacts to below a level of significance.



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	Otay Water District Capital Improvement Projects (cont.)											
18	P2451	Otay Mesa Conveyance and Disinfection System	Proposed linear alignment from the Mexico border along Paseo de La Fuente and Alta Road, terminating at the 571-1 reservoir northwest of the G.F. Baily Detention Facility	N/A	Approximately 22,000- foot pipeline to bring desalinated water from the planned reverse osmosis plant in Rosarito, Mexico to potential delivery points within the Otay Water District service area.	Joint NEPA/CEQA document to be completed at a later date	Potential impacts have not been identified at this time.					
19	P2482	Otay Mesa Lot 7 Groundwater Well	Southwest of the terminus of SR 125 and the SR 11/SR 905 interchange	N/A	Installation of two wells and associated water treatment systems within an industrial area in south Otay Mesa	PEIR	Potential impacts related to biological resources, cultural and archaeological resources, energy, and paleontological resources.					
20	R2034	Res 860-1 Reservoir	North of Kuebler Ranch Road and east of the East Mesa Reentry Facility	N/A	Construction of a 4.0 million-gallon (MG) reservoir for recycled water storage.	PEIR	Potential impacts related to air quality, biological resources, archaeological resources, paleontological resources, landform alteration and visual aesthetics, land use and planning, noise, and hazardous materials.					



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	Otay Water District Capital Improvement Projects (cont.)											
21	P2228	Res 870-2 Reservoir	North of Kuebler Ranch Road and east of the East Mesa Reentry Facility	N/A	Construction of a 10.0 MG reservoir for potable water storage.	PEIR	Potential impacts related to air quality, biological resources, archaeological resources, paleontological resources, landform alteration and visual aesthetics, land use and planning, noise, and hazardous materials.					
22	R2058	Reclaimed Water Pipeline Placement (RecPL)– Airway Road	Airway Road from Otay Mesa to Alta Road	N/A	Construction of a 10,700- foot, 16-inch recycled water pipeline in Airway Road	Part of Project P2048 (Otay Mesa Recycled Water System Link), to be evaluated in future CEQA compliance document.	Potential impacts have not been identified at this time.					
23	R2077	RecPL – Alta Road	Alta Road from Alta Gate to Airway Road	N/A	Construction of a 7,900- foot, 24-inch recycled water pipeline in Alta Road.	Part of Project P2048 (Otay Mesa Recycled Water System Link), to be evaluated in future CEQA compliance document.	Potential impacts have not been identified at this time.					



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts						
	Otay Water District Capital Improvement Projects (cont.)												
24	R2087	RecPL – Wueste Road	Wueste Road from Olympic to Otay Water Treatment Plant	N/A	Construction of a 13,500- foot, 24-inch recycled water pipeline in Wueste Road	Part of Project P2048 (Otay Mesa Recycled Water System Link), to be evaluated in future CEQA compliance document.	Potential impacts have not been identified at this time.						
25	P2390	Siempre Viva Bridge Pipeline Crossings	Siempre Viva Road, west of SR 905	N/A	Installation of pipelines and appurtenances within a future bridge crossing	PEIR	Potential impacts related to paleontological resources, landform alteration, and visual aesthetics.						
26	P2589	Potable Water Pipeline – Donovan Prison	From Alta Road to the Donovan Correctional Facility to the west	N/A	Construction of a 600- foot, 24-inch pipeline from the proposed P2451 pipeline to the Donovan Correctional Facility	PEIR	Potential impacts related to air quality, biological resources, paleontological resources, GHG, and hazardous materials.						
	•			Caltı	rans								
27	N/A	SR 905/SR 125/ SR 11 Southbound Connectors Project	Near the SR 905/ SR 125/SR 11 interchange, south of Otay Mesa Road	N/A	Construction of southbound connectors from the SR 905/SR 125/SR 11 interchange, currently being designed with construction expected to begin in 2018.	Pending	Potential impacts have not been identified at this time.						



Table 1-1 (cont.) **CUMULATIVE PROJECTS Identifying** CEQA/NEPA Map Key **Project Name Potential Impacts Project** Location Acres **Proposed Improvements Document** Number Caltrans / GSA The SR 11 Project would 28 PM 0.0/2.7 SR 11 Segment 2 East of the 212-**EIR** Potential impacts related to EA 056300 (tolled segment SR 905/SR 125 236 consist of constructing paleontological resources, from Enrico Fermi interchange, approximately two miles hazardous materials, air Drive to Siempre of a new 4-lane freeway extending east quality, and biological from the SR 905/SR 125 Viva Road) and and south to a resources. Environmental Segment 3 (Otay new POE at the junction to the future consequences remaining substantial after mitigation Mesa East Port of U.S.-Mexico Federal POE at East Otay Mesa in San Diego include impacts related to border. Entry [POE]) County. Segment 1 from traffic, visual, and noise. SR 905 east to Enrico Fermi Drive was completed and opened to traffic in November 2016. **GSA / CBP Capital Improvement Projects** U.S. Cargo Import Project consists of adding 29 N/A Directly east of N/A N/A N/A Facility the existing Otay lanes to a connector Mesa POE at the roadway, modifying approaches and fences for U.S.-Mexico border booths and other infrastructure improvements to enhance goods movement at the U.S. Cargo Import

Facility.



	Table 1-1 (cont.) CUMULATIVE PROJECTS												
Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts						
	GSA / CBP Capital Improvement Projects (cont.)												
30	N/A	Reconfiguration and Expansion of the Existing San Ysidro POE (Phase 2 and Phase 3)	San Ysidro POE, 720 East San Ysidro Boulevard	50	Three-phase project includes demolition and new construction of most of the POE. Phase 1 has been completed. Phase 2 would involve construction of a 120,000-sf Administration and Pedestrian Building (planned completion Summer 2019) and Phase 3 would include north and southbound inspection facilities (planned completion Summer 2019).	EIS	Potential impacts to traffic, historical resources, paleontological resources, hazardous waste/materials, biological resources. Additionally, short-term, construction related impacts associated with utilities, emergency services, and energy.						
					an Diego								
31	Project No. 310690/ SCH No. 2015111012	San Ysidro Community Plan Update and San Ysidro Historic Village Specific Plan	The San Ysidro planning area, south of SR 905 and north of the U.S./Mexico border	1,863	Updated community plan, creation of a Local Coastal Plan, provision of site-specific policies, amendments to the Land Development Code for adoption of a rezone, rescission of the San Ysidro Planned District ordinances, and comprehensive updates to both existing Public Facilities Financing Plans resulting in new Impact Fee Studies.	PEIR	Potential significant impacts, with proposed mitigation to reduce impacts to less than significant, include biological resources, geology and soils, archaeological and cultural resources, noise, and paleontological resources. Significant and unavoidable impacts were identified for transportation circulation, air quality, and historical resources.						



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Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	City of San Diego (cont.)											
32	Project No. 30330/304032 SCH No. 2004651076	Otay Mesa Community Plan Update	The Otay Mesa Community planning area east of I-805 and north of the U.S./Mexico border	9,302	Update to the 1981plan, amendment to the General Plan, rezone ordinance to replace the Otay Mesa Development District with citywide zoning, LDC amendments and approval of an updated Public Facilities Financing Plan.	PEIR	Potential impacts related to land use, air quality, biological resources, transportation/circulation, geology/soils, historical resources, hydrology/water quality, paleontological resources, human health/public safety/hazardous materials, noise, utilities, and GHG. With the exception of impacts related to air quality (criteria pollutants, stationary sources/collocation), transportation/circulation, noise (traffic/stationary sources and construction), utilities (solid waste), and GHG, mitigation measures are proposed that would reduce impacts to below a level of significance.					
33	408329	Otay Mesa Central Village Specific Plan	Otay Mesa Central Village Specific Plan Area (see Otay Mesa Community Plan)	229.2	Implementation of the City of Villages strategy through site-specific land use policies and design guidelines.	Addendum to the Otay Mesa Community Plan EIR	Potential impacts related to transportation/circulation, air quality, noise, biological resources, historical resources, geology and soils, and paleontological resources.					



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Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts
			City	of San I	Diego (cont.)		
34	371807	Southview East	East side of Caliente Avenue at the intersection with Airway Road bisected development located north and south of Airway Road	21.2	86 Multifamily condominiums on a vacant 21.2-acre site, leaving 12.9 acres as open space	Addendum to PEIR (Report No. 30330/304032/ SCH No. 2004651076	Project-level analysis revealed no new impacts from the previously certified PEIR.
35	412529	Southwind	Southwest of Caliente Avenue, where Caliente Avenue ends	4.96	75 condominiums	N/A	N/A
36	4925	Playa Del Sol	South of Ocean View Hills Parkway, North of State Route 905 and west of A Street	45.97	1,578 unit condominium project consisting of six three story buildings and ten four story buildings with two levels of underground parking, three approximately 9,608 sf recreational buildings	Addendum to EIR (SCH No. 85022015)	Potential impacts related to land use, transportation/circulation, biology, historical resources, landform alteration/visual quality, geology soils, water quality, noise, paleontology, human health and public safety, air quality, water supply, waste management, public services, and utilities



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts					
	City of San Diego (cont.)											
37	438188/SCH No. 2014111068	PURE Water Program	Southwest of the I-5/805 split, with the proposed pipeline alignment north of the Otay Mesa planning area to the Otay Reservoir east of SR 125	N/A	Proposed South Bay facilities include expansion of the existing SBWRP and new facilities to produce and transport purified water, including a pipeline connecting the SBWRP to the Otay Reservoir.	PEIR	Potential impacts related to land use, air quality/odor, health and safety, biological resources, noise, historical resources, hydrology and water quality, paleontological resources, public utilities, visual effects and neighborhood character, geology/soils, and transportation, circulation, and parking.					
38	2246	Airway 18 Truck Terminal/Airway Auto Park Storage	Southeast of the intersection of Airway Road and Britannia Blvd.	19.7	Truck terminal.	N/A	N/A					
39	SCH No. 2015051020	Otay Truck Route Phase IV	Fronts a portion of the U.S./Mexico border, cross streets include Brittania Blvd and La Media Rd	N/A	Approximately 1.9 miles of improvements along an existing paved/gravel road and some cross street intersections, to include a combination of asphalt roadway, concrete curb, retaining wall, and structure elements.	MND	Potential impacts to biological resources.					
40	4987	California Terraces: Planning Areas 13 & 14 Phase I	5213 Otay Mesa Road. Northeast corner of Ocean View Hills Parkway and Otay Mesa Road	45.1	644 MFR and 2.4 acres for a commercial center (24,000 sf)	N/A	N/A					



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts
			City	of San I	Diego (cont.)		
41	N/A	Rivera Del Sol: Neighborhood Park	Between Del Sol Blvd. and Rivera Shores Street	4.9	4.9-acre neighborhood park.	N/A	N/A
42	6738	Hidden Trails: Neighborhood Park	East of Ocean View Hills Parkway	3.7	4.1-acre neighborhood park.	N/A	N/A
43	N/A	St. Jerome Catholic Church	Northwest corner of the SR 905 and Ocean View Hills Parkway intersection	17	Phase I of this project consists of the construction of a 23,000-sf, 1,500-seat church with an outdoor gathering area, two drop-off zones and 532 parking spaces. Phase II includes a 48,000-sf education center that includes a preschool, elementary school, parish hall/gymnasium, outdoor amphitheatre, play fields and administration building.	N/A	N/A
44	50591/40329/ SCH No. 2013101036	Candlelight Villas	Southeast of Caliente Avenue and Airway Road	44.19	Proposed subdivision into three multi-family residential lots totaling 26.33 acres, and two open space lots totaling 15.76 acres, as well as trail and trail access improvements.	EIR	N/A



Map Key	Identifying Project Number	Project Name	Location	Acres	Proposed Improvements	CEQA/NEPA Document	Potential Impacts
			City	of San D	Diego (cont.)		
45	4281	Las Californias Center	8077 Siempre Viva Road. South of Siempre Viva Road and west of Britannia Blvd.	68.5	TM to create 31 lots. Two industrial parks, one of 374,300 sf and one of 305,900 sf	N/A	N/A
46	5751	Just Rite	Northeast corner of Siempre Viva Road and Britannia Blvd.	34.44	12 lots for industrial development.	N/A	N/A
47	88422/88430	Brown Field Tech Park/Otay Mesa Business Park	South of Otay Mesa Road and west of Britannia Blvd.	73	Business park.	N/A	N/A
48	147108	Britannia 40	Northwest of the Siempre Viva Road and Cactus Road	39.3	Construction of a 10,000 sf building on a vacant site.	N/A	N/A



Table 1-1 (cont.) CUMULATIVE PROJECTS Identifying CEQA/NEPA Map Kev Project **Project Name** Location **Proposed Improvements Potential Impacts** Acres **Document** Number California Prison Health Care Receivership Corporation (CPR) Potential impacts related to air 49 N/A Level II Infill R.J. Donovan 70-Construction of a new EIR Correctional Correctional 105 317,000-sf housing quality during construction, **Facilities Project** Facility at Rock facility. biological resources, Mountain, 480 paleontological resources, Alta Road hazardous materials. hydrology, and traffic/transportation. Significant, unavoidable impacts were identified related to traffic during project construction. Mitigation measures were identified for the remaining potential impacts which would reduce impacts to less than significant. County of San Diego Department of Environmental Health (DEH) Potential impacts related to 50 N/A East Otay Mesa Located two Recycling collection IS Checklist. 450 center and Class II solid Recycling Center miles east of EIR pending aesthetics, biological and Landfill Siempre Viva waste landfill resources, hazards and Rd. exit from hazardous materials, mineral I-905 resources, public services, utilities and service systems, agricultural resources, cultural resources, hydrology and water quality, noise, recreation, air quality,

Key: SFR = Single-family residences; MFR = Multi-family residences; DU = Dwelling units; TM = Tentative Map; TPM = Tentative Parcel Map; VTM = Vesting Tentative Map; SDP = Site Development Permit; STP = Site Plan; MUP = Major Use Permit; RP = Reclamation Plan; ZAP = Minor Use Permit; RPL = Replacement; SPA = Specific Plan Amendment; N/A = Not Available or Not Applicable.



geology and soils, and transportation/traffic

5.7 <u>Summary of Project Impacts and Significance and Conclusions</u>

The contrast caused by the Proposed Project during operation would be noticeable but not visually dominant, would not be larger in scale than the surrounding elements, would introduce new diversity, and slightly interrupt the continuity of overall views. The steeper, rockier slopes created by the proposed extraction operations would support sparser vegetation than the hills surrounding the Project site; final slopes would be steeper (up to 1:1) than the existing hills on and near the Project site and would have horizontal benches spaced evenly across them. The rock staining and native plants proposed in the Reclamation Plan, however, would provide visual continuity between the Project site post-reclamation and the surrounding area, softening contrast and ensuring that the diversity created by the Project would not be incompatible with the visual environment. Additionally, reclamation of the site would allow future development that would be compatible with future surrounding development according to the EOMSP. The Project, therefore, would not cause a significant impact to the existing visual environment or be inconsistent with applicable design guidelines (Guideline 1).

The Proposed Project elements would not interrupt views of the largest, silhouetted mountains; the San Ysidro Mountains would continue to provide the dominant background in eastward views of the area. Post-reclamation, the Project site would be characterized by manufactured slopes that would be steeper, and more uniform and geometric than the existing hillsides, with evenly spaced benches extending horizontally across the length of the new slopes. This configuration would affect continuity of the area's visual environment, and undisturbed native vegetation existing on the Project site would be impacted, although not all of the vegetation would be disturbed at the same time, and the greatest contrast between the exposed soil and the surrounding undisturbed vegetation would be temporary. The proposed Reclamation Plan includes a Revegetation Plan with similar species. The site reclamation would soften the contrast created by the exposed soil and would ensure that the Proposed Project slopes would be more compatible with the existing vegetation on the hillsides and pads abutting the Project site. The approximately 329 acres of open space preserved as part of the Project east of the mining footprint would ensure that visible native habitat is retained *in perpetuity*. Proposed project impacts to valued visual elements would be less than significant (Guideline 2).

The Proposed Project would not degrade the quality of views from public trails such as Otay Mountain Truck Trail and the proposed future trail on Calzada de la Fuente; visible elements of the Project would be below dominant slope lines when viewed from the west, and below the viewer when viewed from the east. The Project's contribution to industrial built environment related to structures on the northern parcel would be visually outweighed by the taller and larger structures of the abutting existing and planned power facilities. No other existing public parks or recreation areas, surface waters or major drainages, ridgelines, or other sensitive public viewpoints are located within the Project site or close enough to the Project site to provide sensitive viewpoints. The Project, therefore, was found to have no significant adverse visual impacts due to degradation of these resources (Guideline 3).

The San Ysidro Mountain foothills and canyons are identified in the EOMSP as areas of special scenic beauty. Johnson and O'Neal Canyons would not be impacted by the Proposed Project. Excavation into the foothill hillsides would occur in an area not distinguished by notable topographic features differentiated from the rest of the foothills (i.e., not prominent), and would



not affect skylined hilltops or ridgelines. Staining and revegetation in under a phased program would soften the greatest levels of contrast within an approximately 25-year period (including all hillside mining phases and some time for plant establishment), and ultimately, would be additionally shielded by additional development consistent with the EOMSP. Additionally, although potential scenic highways exist in the area, none is officially designated; therefore, the Project would not impact scenic highways. The lighting proposed for the Project, consisting of directed, downward-shielded lighting would meet the objectives of the Dark Sky Ordinance and would be visually similar to lighting at the closest developed facilities, including the power plant and the prisons. The Project, therefore, would meet the applicable policies and planning guidelines for the area (Guideline 4).

6.0 VISUAL MITIGATION AND DESIGN CONSIDERATIONS

While some elements of the Proposed Project operations would result in notable contrast with the surrounding areas, the limited number of sensitive viewers, the distance to the Project impact footprint from these points, the incorporation of phased reclamation activities into the Project, and the extensive, panoramic nature of the setting in which the Project would be located result in Project-related changes not being visually significant. No mitigation measures beyond Project design in the Reclamation Plan are required.

The Reclamation Plan provided as part of the Proposed Project details slope and pad revegetation and includes plant palettes and planting methods to both provide erosion control and help visually blend the manufactured slopes created by the Project with the existing slopes in the area. As described above, reclamation of Project slopes would occur following completion of mining in each area during Phases 2. The plant palettes proposed in this Reclamation Plan are drawn from existing conditions on and near the Project site. Additionally, the Reclamation Plan calls for rock outcroppings and exposed rock faces that cannot be planted to be stained to resemble aged rock rather than newly exposed stone. These measures are adequate to ensure that the level of contrast that would be created by the Proposed Project would be no more than moderate. With regard to streetscape planting, the Project would install approximately 9,705 square feet of screening canopy trees and shrubs along Project frontage on Calzada de la Fuente. No additional mitigation measures are recommended.



7.0 REFERENCES

County of San Diego

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